Safeguarding and Child Protection Policy and Procedures

DLD College London

August 2026

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Key College contacts

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Key external contacts

Designated Officer(s) of the local authority	Ed Snelgar Quality Assurance & Safeguarding Service, London Borough of Lambeth, 2nd Floor, Lambeth Civic Centre, 6 Brixton Hill, SW2 1EG Telephone number: 0207 926 4679 Email: ESnelgar@lambeth.gov.uk/ lado@lambeth.gov.uk
Lambeth children's social care department	Telephone number: 020 7926 3100 or 020 7926 5555 Email: helpandprotection@lambeth.gov.uk Out of hours emergency: 020 7926 5555 Duty team telephone number: 020 7926 5555
Lambeth Safeguarding Children Partnership	Telephone number: 0207 926 4759 Email: helpandprotect@lambeth.gov.uk Out of hours emergency: 0207 926 5555 Duty team telephone number: 0207 926 3100
NSPCC FGM Helpline	0800 028 3550 fgmhelp@nspcc.org.uk
FGM reporting - non-emergency police contact number	101
Police	999
College's Police liaison officer	Email: Waterloo&SouthBank@contact.metengage.co.uk
Prevent partners and advice about extremism	**Channel Police Practitioner and Channel Local Authority Chair** Name: Contact via Lambeth Prevent Team Telephone number: 020 7926 9486 Email: prevent@lambeth.gov.uk **Non-emergency DfE advice** 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk

NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk
Disclosure and Barring Service	Helpline: 0300 200190 Barring referrals: dbsdispatch@dbs.gov.uk

1 Aims

1.1 This is the Safeguarding and child protection policy and procedures of DLD College London

1.2 The aims of this policy are as follows:

1.2.1 to actively promote the well-being of students[1];

1.2.2 to safeguard and promote the welfare of children[2], staff and others who come into contact with the College and to protect them from harm;

1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;

1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

1.2.5 to raise staff awareness about the College's safeguarding expectations;

1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.2.7 to ensure consistent good safeguarding practice throughout the College, to include the promotion of a zero tolerance approach to sexism, racism, misogyny/misandry, homophobia, biphobia, child-on-child abuse including sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict in which students are confident to report it and staff are confident to identify and respond to it; and

1.2.8 to promote a whole college culture of safety, equality and protection.

1.3 Every student should feel safe and protected from any form of abuse, neglect and exploitation.

1.4 All staff should understand the indicators of abuse, neglect, exploitation and modern slavery and understand specific safeguarding risks so that they can identify them and report any concerns about children, including where they are given reason to suspect that a child sex offence may have been committed. The indicators and key safeguarding risks for the College community are set out in Appendix 1.

1.5 All staff should be aware that the Crime and Policing Act 2026 imposes a duty in certain circumstances to notify the police and/or local authority where, in the course of a relevant activity, a person is given reason to suspect that a child sex offence may have been committed.

1.6 Members of the College community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.

[1] This wording reflects the requirements in part 8 paragraph 34 of the ISSR. Well-being means well-being within the meaning of section 10(2) of the Children Act 2004(a): the physical and mental health and emotional well-being; protection from harm and neglect; education training and recreation; contribution made by students to society; social and economic well-being.
[2] This wording reflects the requirements in part 3 paragraph 7 of ISSR.

1.7 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

1.8 This policy forms part of the College's whole college approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the College to ensure that the best interests of students underpins and is at the heart of all decisions, systems, processes and policies.

1.9 The College recognises that safeguarding risks are dynamic and may evolve over time. This includes risks arising from online activity, emerging technologies (including artificial intelligence), misogyny and harmful gender-based attitudes, and the fact that safeguarding issues are often interrelated and may overlap. The College will take a proactive and responsive approach to identifying and addressing such risks.

1.10 Although this policy is necessarily detailed, it is important to the College that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, students, parents and carers. The College welcomes feedback on how we can continue to improve our policies.

2 Scope and application

2.1 This policy applies to the whole College.

2.2 This policy applies at all times including where students or staff are away from the College, whether they are on college-arranged activities or otherwise, and whether or not the College is open. It will therefore apply out of College hours and in the holidays.

2.3 This policy applies to core College activities and to out of hours and commercial[3] activities run by the College. Where a Third Party is using the premises, the College will ensure that there is a written agreement in place confirming they have adequate safeguarding procedures.

2.4 This policy is designed to address the specific statutory obligations on the College to safeguard and promote the welfare of children.

2.5 A 'Child' is someone who has not yet reached their 18th birthday, however in practice this policy applies to all young people studying or living within the College's accommodation.

3 Regulatory framework

3.1 This policy has been prepared to meet the College's responsibilities under the following legislation:

3.1.1 Education (Independent School Standards) Regulations 2014;

3.1.2 *National minimum standards for boarding schools* (Department for Education (**DfE**), May 2026);

3.1.3 Education and Skills Act 2008;

3.1.4 Children Act 1989;

[3]Paragraphs 200-201 of KCSIE 2026 requires the College to make sure there are adequate safeguarding arrangements in place for commercial activities, even if they do not involve students. The arrangements for such activities and their management may differ from in school arrangements and appropriate detail should be included here or in an Appendix.

3.1.5 Children Act 2004;

3.1.6 Safeguarding Vulnerable Groups Act 2006;

3.1.7 Children and Social Work Act 2017;

3.1.8 Data Protection Act 2018, UK General Data Protection Regulation (**UK GDPR**) and the Data (Use and Access) Act 2025 (together referred to as 'data protection laws');

3.1.9 Equality Act 2010;

3.1.10 Human Rights Act 1998;

3.1.11 Care Act 2014[4]; and

3.1.12 Crime and Policing Act 2026.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Statutory guidance:

(a) Keeping children safe in education (DfE, September 2026) (**KCSIE**);

(b) Working together to safeguard children 2026 (DfE, updated March 2026) (**WTSC**);

(c) Working together to improve school attendance (DfE, July 2026);

(d) Mobile phones in schools: guidance (DfE, January 2026, became statutory on 29 June 2026);

(e) Prevent Duty guidance for England and Wales (HM Government, December 2023);

(f) Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

(g) Children missing education (DfE, September 2025);

(h) Relationships education, relationships and sex education and health education guidance (DfE, September 2026);

(i) Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023, updated December 2023); and

(j) PACE Code C 2019.

3.2.2 Non-statutory advice:

(a) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

(b) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024);

[4] To take account of pupils aged 18 or over.

(c) Sharing information to safeguard children and young people in the education sector in the UK (ICO);

(d) The key principles of Prevent (Home Office, February 2026);

(e) Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);

(f) Meeting digital and technology standards in education (DfE, maintained);

(g) Plan technology for your school (HM Government, September 2024);

(h) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DSIT and UKCIS, March 2024);

(i) Searching, screening and confiscation: advice for schools (DfE, in force from September 2022);

(j) Teaching online safety in schools (DfE, January 2023);

(k) Generative AI: product safety expectations (DfE, January 2025);

(l) Using AI in education settings: support materials (DfE, June 2025);

(m) Harmful online challenges and online hoaxes (DfE, February 2021);

(n) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme);

(o) Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);

(p) Forced marriage resource pack (Home Office, May 2023);

(q) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, updated April 2024);

(r) Educate Against Hate (HM Government, maintained);

(s) Managing the risk of radicalisation in your education setting (DfE, September 2023);

(t) Equality Act 2010: advice for schools (DfE, June 2018);

(u) After-school clubs, community activities and tuition: safeguarding guidance for providers (DfE, September 2023); and

(v) Sponsorship Duties (UKVI, May 2025).

3.2.3 Lambeth Safeguarding Children Partnership's referral / threshold procedures / guidance: https://www.lambethsaferchildren.org.uk/

3.3 The following College policies, procedures and resource materials are relevant to this policy:

3.3.1 Staff conduct policy;

3.3.2 Ethical and professional conduct (Abbey DLD College ltd policy);

3.3.3 Behaviour, Discipline and Exclusion policy;

3.3.4 Anti-bullying policy, which includes cyber bullying;

3.3.5 ICT usage Policy

3.3.6 Health and Safety Policy;

3.3.7 Online Safety Policy;

3.3.8 Mobile Phone Policy;

3.3.9 Social Media Policy;

3.3.10 Whistleblowing Policy;

3.3.11 Recruitment Policy;

3.3.12 Risk Assessment Policy;

3.3.13 Child Supervision and Missing Child Policy;

3.3.14 Special Educational Needs and Disability (SEND Policy;

3.3.15 Volunteer and Visiting Speaker Policy;

3.3.16 Sex and Relationships Education Policy;

3.3.17 Mental health Policy;

3.3.18 Guardian and overnight hosts Policy and

3.3.19 Transgender Policy

4 Publication and availability

4.1 This policy is published on the College website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from the Principal's PA during the College day.

4.4 This policy can be made available in large print or other accessible format if required.

4.5 This policy and all policies referred to in it are also available to staff on the DLD College London website.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to the **Proprietor** are references to the Board of Governors;

5.1.2 References to **working days** mean Monday to Friday, even if a boarding college or the College is open on Saturdays when the College is open during term time. The dates of terms are published on the College's website. If referrals to an external

agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;

5.1.3 **Safeguarding** is the protection of people from harm.

5.1.4 **Safeguarding and promoting the welfare of children** is defined in KCSIE 2026 as:

(a) providing help and support to meet the needs of children as soon as problems emerge;

(b) protecting children from maltreatment, whether that is within or outside the home, including online;

(c) preventing impairment of children's mental and physical health or development;

(d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

(e) taking action to enable all children to have the best outcomes.

5.1.5 **Child** means a child under the age of 18. This Policy which applies to all registered students whether they are under or over 18 years with adjustments as appropriate to reflect their age.

5.1.6 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the College is located and, where appropriate, the team based in the local authority where the child is resident.

5.1.7 **DSL** means the College's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

5.1.8 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners

5.1.9 **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Board and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

5.1.10 **Early help** means support for children and families as soon as a problem emerges, at any point in a child's life. This includes universal and community-based early help services and targeted early help provided through Family Help arrangements. Family Help may include both non-statutory early intervention and support provided under section 17 of the Children Act 1989 (children in need).

5.1.11 The term '**making or sharing nudes and semi-nudes**' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term '**images**' includes all visual content, such as photographs, videos and livestreams.

Images may be taken by the child themselves or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

5.1.12 References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

5.1.13 Reference to **staff** includes all those who work for or on behalf of the College, regardless of their employment status, including contractors, supply staff, trainee teachers, volunteers and Governors unless otherwise indicated.

5.1.14 **Senior Leadership Team** (**SLT**) comprises the Principal, Senior Vice Principal (Pastoral) and DSL, Vice Principal (Academic), and Bursar (known as ELT)

6 Responsibility statement and allocation of tasks: the College's approach to safeguarding leadership

6.1 The Proprietor has overall responsibility for all matters which are the subject of this policy, including:

6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of students at the College, having regard to relevant guidance issued by the Secretary of State;

6.1.2 strategic leadership responsibility for the College's safeguarding arrangements; and

6.1.3 specific responsibilities to facilitate a whole college approach to safeguarding, set out in more detail in Part 2 of KCSIE.

6.2 The Proprietor:

6.2.1 appoints a Board level lead on safeguarding matters, whose contact details are set out in the College contacts list at the front of this policy;

6.2.2 ensures that all members of the governing body receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

6.2.3 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;

6.2.4 ensures the College has appropriate cyber security systems in place, in line with the Cyber security standards, to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks[5];

6.2.5 ensures that appropriate arrangements are in place for the whole Board to discharge their function, including appropriate consideration of safeguarding

[5] Guidance on e-security is available from the National Education Network, and broader cyber security advice, including resources for governors and trustees, can be found at National Cyber Security Centre – NCSC.

matters at Board meetings and a holistic annual review of safeguarding. The Safeguarding Governor reports to the Board on safeguarding matters at every Board meeting (minimum of four per year) and submits an annual safeguarding review/report at the first Board meeting of the academic year; and

6.2.6 establishes appropriate delegation arrangements at College level, led by the Principal and DSL, to enable the College to discharge its safeguarding duties effectively.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	**Allocated to**	**When / frequency of review**
Keeping the policy up to date and compliant with the law and best practice	Senior Vice Principal	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness[6]	Senior Vice Principal	As required, and at least termly
Seeking input from interested groups (such as students, staff, parents) to consider improvements to the College's processes under the policy	Senior Vice Principal	As required, and at least annually
Formal annual review of the College's safeguarding policies and procedures and their implementation.	Proprietor	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Bursar	Before commencement of arrangement and thereafter at least annually

6.4 **Principal**

6.4.1 The Principal is responsible for the overall management of the College and for the management of concerns and allegations about staff.

6.4.2 The Principal ensures that the College's policies and procedures, adopted by the governing body and proprietor (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff.

6.5 **Designated Safeguarding Lead (DSL)**

[6] Please note that responsibilities for safeguarding across the College's operation should be clear and may be shared with others e.g. for trading activities or due diligence of hirers / contractors. This Policy should reflect the College's arrangements.

6.5.1 The DSL is a senior member of staff of the College's leadership team with the necessary status, authority, skills and experience to take lead responsibility for all [7] aspects of safeguarding and child protection (including online safety) and understanding the filtering and monitoring systems and processes in place) throughout the College.

6.5.2 The DSL has the appropriate status and authority within the College to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the College contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex B of KCSIE.

6.5.3 The DSL will also liaise with the Principal to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE Code C and any other code of practice apply.

6.5.4 The DSL will take leave responsibility for students who are looked after children.

6.5.5 The DSL (or deputy DSL) will, where required, make notifications to the local authority and/or police in accordance with the College's safeguarding obligations, including the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.[8]

6.5.6 The DSL will also undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of students and staff. Please refer to the College's "Students Mental Health and Wellbeing Policy" for further details on routes to escalate these issues and referral and accountability systems.

6.5.7 The DSL will undertake the role of senior attendance champion with overall responsibility for student attendance and for liaising with students' Parents and external agencies in that regard.[9]

6.5.8 The College maintains formal cover arrangements and shared confidential reporting systems (including a shared safeguarding mailbox) to ensure continuity of safeguarding when the DSL is unavailable.[10] If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the College contacts list at the front of this policy.

[7]If the College has appointed others to lead certain aspects of the College's safeguarding function, for example its commercial activities or its wider charitable safeguarding function, then details should be added here

[8] The Crime and Policing Act 2026 introduces a new statutory duty for individuals undertaking key roles with responsibility for children and young people in England to report suspected child sex offences when they are made aware of it.

[9] While pupil attendance is the responsibility of all staff, the DfE expects schools to have in place a designated attendance champion in the SLT with clearly assigned responsibilities. If the DSL does not take on this role we recommend they are a member of the SLT so that they have the authority, capacity and support to influence and lead strategic change within the setting. If the DSL does not take on this role please amend the policy to ensure that it reflets the College's custom and practice.

[10] Schools have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered.

7 Specific safeguarding duties in relation to children

7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

7.2 The College is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The College requires everyone who comes into contact with children and their families to share this commitment.

7.2.1 The College will:

(a) understand its role in the safeguarding partner arrangements (Home - Lambeth Safeguarding Children Partnership) and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Lambeth Safeguarding Partners

(b) be alert to signs of abuse whether in college, within the child's family or from outside, and take immediate[11] steps to protect individuals from any form of abuse, neglect, exploitation or modern slavery whether from an adult or another child;

(c) ensure that concerns, allegations and disclosures relating to child sexual abuse are managed in accordance with statutory safeguarding requirements and that, where a person is given reason to suspect that a child sex offence may have been committed, any notification required under the Crime and Policing Act 2026 is made as soon as practicable;

(d) be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds;

(e) understand the impact of poverty and the distinction between poverty and neglect;

(f) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

(g) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

(h) take active steps to promote, monitor and analyse college attendance;

(i) allow staff to determine how best to build trusted relationships with students which facilitate communication within the parameters of the staff code of conduct;

(j) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

[11]Paragraph 85 of the statutory guidance 'Relationships Education, Relationships and Sex Education (RSE) and Health Education' (September 2026) states "*If staff have any concerns about a child's welfare, they should act on them immediately*".

(k) design and operate procedures which, so far as possible, ensure that staff students and others are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(l) prepare staff to identify children who may experience vulnerability[12] and may benefit from universal services and community based early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;

(m) take a whole-college public health / preventative approach to harmful sexual behaviour, recognising the escalatory nature of misogyny and other forms of prejudice from low-level sexist language to more serious harmful behaviours, which may contribute to an unsafe environment or normalisation of abuse, and the benefits of early identification and intervention;[13]

(n) be alert to risks online and take reasonable steps to protect children from online harm, including in its approach to filtering and monitoring;

(o) put in place appropriate security protection measures to safeguard information systems and review the effectiveness of these procedures;

(p) take appropriate action to meet the Cyber security standards in order to improve resilience against cyber-attacks;

(q) be alert to children who are at potentially greater risk of harm (both online and offline) including children who need a social worker and children requiring mental health support;

(r) consider its approach to protecting children where there is a significant gender imbalance in the College;

(s) be alert to the needs of students with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;

(t) encourage a culture of listening to students and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the College to protect them;

(i) Access to a trusted adult, including the DSL, HM, tutor, houseparent matron and counsellor

(ii) Open door arrangements enabling students to raise concerns at any time, with support available signposted around the school

(iii) Opportunities to contribute through regular student voice activities, focus groups and through the student council

[12] This wording has been inserted to reflect the findings of the National Children's Bureau's research 'From Trait to State' in relation to the concept of vulnerability and reflect the approach taken in care provision
[13] A specific Lucy Faithfull Foundation recommendation, but rooted in KCSIE 2026

(iv) Use of Skodel to privately share concerns with tutor/houseparent and get proactive support

(v) Clear safeguarding information displayed around the school and on the website, explaining how students can raise concerns and the process when they do

(u) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(v) assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(w) identify students who may be susceptible to extremist ideology and radicalisation and know what to do when they are identified;

(x) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students in the College or in the local area;

(y) comply with its statutory duties and have regard to relevant guidance in relation to safeguarding requirements for college premises,[14] including ensuring that toilets, changing facilities and showers are provided and used in accordance with legal requirements relating to single-sex provision, and that any alternative arrangements are considered carefully, recorded and reviewed, without compromising the safety, privacy, dignity or wellbeing of students. The College's approach, including its safeguarding duties and the process for considering any requests relating to social transition, is set out in the College's Gender Questioning Children and Social Transition Policy

(z) ensure that, in relation to sport and physical education, participation is organised in a way that is safe, fair and appropriate, including where necessary providing for single-sex participation in accordance with the Equality Act 2010 and safeguarding considerations[15], and that any requests relating to participation are considered on a case-by-case basis with regard to the child's welfare, the safety and fairness of the activity, and the impact on other students. The College's approach, including its safeguarding duties and the process for considering any requests relating to social transition, is set out in the College's Gender Questioning Children and Social Transition Policy; and

(aa) ensure that appropriate policies and procedures are in place to safeguard students which it sponsors to study in the UK under the Student or Child Student immigration route. [16]

7.3 Staff may follow the College's Whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the College or potential failures by the College or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns

[14] KCSIE 2026 paras 104 - 115
[15] KCSIE 2026 paras 94 - 97
[16] Specific safeguarding duties are included at section 13 of the UK Visas and Immigration Student Sponsorship duties guidance which can be found here: Student sponsor guidance

about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the College's Local Authority if they consider that the College has failed to deal with concerns appropriately.

8 Students aged 18 or over

8.1 It is not uncommon the College to have students in roll who each the age of 18, 19, 20 or 21 in the course of their education. The College's safeguarding responsibilities extend to all members of the College community and its safeguarding policies, procedures and codes of conduct apply to all students, including those aged 18 or over. The College acknowledges its duty of care to these students and the need to consider their specific needs and rights, as well as the need to manage any risk they may present to others, with reference to differences in legal status, maturity, or life experience, for example. Where a student who is aged 18 or over presents safeguarding concerns, the College will consider whether they are, or may be, an "adult at risk" under the provisions of the Care Act 2014. If so, it will follow appropriate safeguarding procedures, including referrals to the relevant local authority's safeguarding adults board, where relevant.

9 Reporting obligations of staff

9.1 Reporting obligations generally

9.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the **best** interests of the student.

9.1.2 Staff should be aware that students 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 e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of protection.

9.1.3 All staff have a duty to:

(a) report any concerns they may have about the safety and / or well-being of students;

(b) where, in the course of engaging in a relevant activity, they are given reason to suspect that a child sex offence may have been committed, comply with any statutory duty to report that suspected offence and cooperate with the College and the DSL in relation to any notification required under the Crime and Policing Act 2026, including where such notification is made by the DSL on their behalf;

(c) report any concerns they may have about the safety and / or well-being of other persons associated with the College;

(d) report any safeguarding concerns about staff or anyone else associated with the College; and

(e) follow up on any such reports to ensure that appropriate action is or has been taken.

9.1.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the College's local authority or that local to the child's home address) or police in their absence for guidance.

9.2 **What to do if staff have a concern about a student's welfare**

9.2.1 If staff have ***any* concern about a student's welfare**, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

(a) The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;

(b) See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 24 below relating to recording a concern.

9.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

9.2.3 Teachers must report known cases of female genital mutilation (**FGM**), virginity testing, hymenoplasty and sexual abuse to the police.[17] See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

9.2.4 Where, in the course of engaging in a relevant activity, a member of staff is given reason to suspect that a child sex offence may have been committed, they must report the matter to the DSL (or DDSL in the DSL's absence) as soon as practicable. Where a notification is required under the Crime and Policing Act 2026, this will ordinarily be made by the DSL on behalf of the member of staff in accordance with the College's safeguarding procedures.

9.2.5 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, trainee teacher, contractors or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

9.2.6 **What if the DSL is unavailable?**

(a) The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of College hours.

(i) Out of hours safeguarding cover is arranged through on-call rota which covers evenings/nights, weekends and holidays.

[17] Virginity testing and hymenoplasty became illegal in 2022 and the Government is introducing a new law which will create a legal requirement for anyone in regulated activity relating to children in England to report if they are made aware a child is being sexually abused. Refer to paragraph 84 of the statutory guidance 'Relationships Education, Relationships and Sex Education (RSE) and Health Education' (July 2025).

(ii) On call staff include the Principal, Senior Vice Principal, Assistant Principal (Pastoral) and Director of Boarding

(b) If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

(c) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 12 below for further details on making a referral.

(d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

9.3 **Action by the DSL**

9.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partners procedures and referral threshold document. Such action may include:

(a) managing any support for the student internally via the College's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether they should inform parents or carers to further support the child's wellbeing, and seeking advice from children's social care where required (see 10 below);

(b) undertaking an early help assessment (which generally requires parental consent) (see 11 below); or

(c) making a referral for statutory services (see 12 below).

9.3.2 Where a notification is required under the Crime and Policing Act 2026, the DSL will make or arrange for the notification to be made to the relevant local authority and/or police force as soon as practicable and in accordance with applicable legislation and guidance.

9.3.3 The views of the child will be taken into account when considering the appropriate course of action, but will not be determinative.

9.3.4 Where the concern relates to the welfare of a Student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

9.3.5 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the student's situation does not appear to be improving.

10 Managing support for students internally

10.1 The College has a framework for the identification, assessment, management and review of risk to student welfare, so that appropriate action can be taken to reduce the risks identified. See section 23 and the College's Risk assessment policy.

10.2 The College will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

11 Universal services and community based Early Help assessment

11.1 Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. It is distinct from targeted early help delivered through Family Help teams, which are more formal arrangements coordinated by local authorities, where a plan is in place and a lead practitioner appointed.

11.2 The College's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from universal services and community-based Early help, or targeted Early help through Family Help arrangements. Staff are mindful of specific safeguarding issues and those students who may face additional safeguarding challenges and/or varying resilience levels from time to time. Staff should be particularly alert to the potential need for early help for a child who:

11.2.1 is disabled or has certain health conditions and has specific additional needs;

11.2.2 has special educational needs (whether or not they have a statutory education, health and care plan) (**EHCP**);

11.2.3 has a mental health need;

11.2.4 is a young carer;

11.2.5 is pregnant and or is a parent themselves;

11.2.6 has exhibited early signs of abusive, violent and/or harmful behaviours;

11.2.7 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

11.2.8 is frequently missing / goes missing from education, home or care;

11.2.9 has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;

11.2.10 is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;

11.2.11 is at risk of being radicalised or exploited;

11.2.12 has a parent or carer in custody or is affected by parental offending;

11.2.13 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

11.2.14 is misusing alcohol or other drugs themselves;

11.2.15 is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;

11.2.16 is a privately fostered child;

11.2.17 is a looked after child; or

11.2.18 is student from overseas without any adult family members in the United Kingdom.

11.3 A member of staff who considers that a student may benefit from community-based Early help, or targeted early help through Family Help arrangements should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of early help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

11.4 If early help is appropriate, staff may be required to support other agencies and professionals in a community based early help assessment and will be supported by the DSL in carrying out this role. In some cases College staff may be required to take a lead role.

11.5 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the student's situation appears to be getting worse, or does not appear to be improving.

12 Making a referral

12.1 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care in line with local reporting procedures (and if appropriate the police) should be made immediately. Where required, a notification must also be made in accordance with the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.

12.2 The contact details for the College's CSC team are set out at the front of this policy. Staff should bear in mind that referrals may be required to the College's CSC team.

12.3 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC. (Home - Lambeth Safeguarding Children Partnership)

12.4 **Statutory assessments**

12.4.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

(a) **Children in need**: *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the*

provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

(b) **Children suffering or likely to suffer significant harm**: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm*.

12.4.2 The threshold document published by Local Safeguarding Partners includes the criteria, including the level of need, for when a case should be referred for assessment and for statutory services under section 17 and 47.

12.5 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE and the flowcharts set out in Chapter 3 of WTSC for information about the likely actions and decisions required.

12.6 Parental consent is usually expected for referrals to statutory agencies, unless this may expose the child to additional harm or is not considered to be in the child's best interests, as staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

12.6.1 personal details of the child including the child's developmental needs;

12.6.2 detailed information about the concern;

12.6.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

12.7 If the referral is made by telephone, this should be followed up in writing.

12.8 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

12.9 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

12.10 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

13 Allegations against students - child-on-child abuse (including sexual harassment and sexual violence)

13.1 Allegations against students should be managed and reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be considered but will not be determinative.

13.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed.

Appropriate support will be provided to all students involved, including support from external services as necessary.

14 Extra-familial harm

14.1 Safeguarding incidents and / or behaviours can be associated with factors outside the College and / or can occur between children outside the College, inside and outside of home and online.

14.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

14.3 Children's social care, or adult social care where appropriate, should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

14.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse, neglect, exploitation and/or modern slavery in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationships abuse, including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious violence, county lines and radicalisation and harm associated with organised networks or gangs. This may also include exploitation linked to modern slavery. The College will take a contextual safeguarding approach when assessing such risks.

15 Risk assessment

15.1 Where a concern about a student's welfare is identified, the risks to and needs of that student will be assessed and appropriate action will be taken to reduce the risks identified and address the child’s wellbeing needs.

15.2 The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual student welfare or safety plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the College's approach to promoting student welfare will be systematic and student focused.

15.3 The Principal has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

16 What to do if staff have a safeguarding concern about someone else's welfare

16.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

16.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

16.3 If, in exceptional circumstances, the DSL (or a deputy) is not available, this should not delay appropriate action. Staff should consider speaking to a member of the Senior Leadership Team and/or contacting local authority children's social care directly. Any action taken must be shared with the DSL as soon as possible.

17 Allegations made and or / concerns raised about staff and others in College

17.1 The College has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the College, whether paid or unpaid, or any Other Adult (as defined in 2.3 of Appendix 4) which may affect the safety and welfare of children.

17.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold.[18] The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. The policy and procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

17.3 The College will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

17.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the College in relation to contact with students, parents, colleagues and any other person who comes into contact with the College. This guidance is contained in the Staff Handbook and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with students.

18 Informing parents

18.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Principal, the Designated Officer(s), children's social care, the police and / or the student (if they are considered to be of sufficient maturity and understanding) before discussing details with parents.

18.2 In all cases, the DSL will be guided by the Lambeth Safeguarding Partners referral threshold document.

18.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

19 Additional reporting

19.1 In addition to the reporting requirements explained above, the College will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

19.1.1 **Health and Safety Executive**

[18] As defined in Part 4 of KCSIE

(a) The College is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the College's Health and Safety Plan for further details about this.

19.1.2 **Disclosure and Barring Service** (**DBS**)

(a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4 for further details.

19.1.3 **Teaching Regulation Agency** (**TRA**)

(a) The College is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher for that reason had the teacher not ceased to provide those services). The College may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. See Appendix 4, for more details.

19.1.4 **Insurers**

(a) The College will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b) Care should be taken to ensure this is done before renewal to ensure that the College complies with its duties under the Insurance Act 2015. If the College is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

19.1.5 **Boarding Schools Association** (**BSA**)

(a) The College will report safeguarding matters to the BSA as required by their Safeguarding Charter.

19.1.6 **UK Visas and Immigration**

(a) In the event that a student holding a Student or Child Student visa sponsored by the College under the Points Based System goes missing, the College will report to UKVI in line with prevailing Student Sponsor Guidance.

(b) Each time the College's attendance register is completed it is treated as a contact point for these purposes.

(c) The College will also ensure that any changes to the care or living arrangements which are in place for a student holding a Child Student visa sponsored by the College meet the requirements of the Immigration Rules and UKVI's Student Sponsor Guidance. Where a change to a student's living or care arrangements do not comply with those requirements then this must be reported to UKVI including the details of the steps that are being taken to rectify the situation.

(d) Where a student holding a Child Student visa sponsored by the College will be cared for in a private foster care setting, the College will notify the local authority in the area where the student will be living as soon as the College becomes aware that the child has arrived in the UK or, if the private foster care arrangement begins after the student arrived in the UK, as soon as it becomes aware of the change.

(e) The report will be made by the College's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.

20 Safer recruitment and supervision of staff

20.1 The College is committed to practising safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) in accordance with Part 3 of KCSIE, including the requirements relating to regulated activity and DBS checks for volunteers introduced by the Crime and Policing Act 2026. See the College's separate Recruitment Policy

20.2 The College maintains a single central register of appointments for all staff.

20.3 The College's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the College's separate Volunteer and Visiting Speakers Policy

21 Use of mobile electronic devices and smart technology

21.1 In accordance with DfE guidance, the College maintains a mobile electronic device-free environment by default[19]. For detailed information on the use of mobile electronic devices and smart technology, please refer to the College's ICT Usage Policy and Mobile Phone Policy

21.2 All staff should use mobile devices and cameras and other electronic devices with imaging and sharing capabilities in accordance with the guidance set out in the staff conduct policy. Unless otherwise agreed in writing, personal mobile devices including laptop and notebook devices should not be used for College purposes except in an emergency.

21.3 Parents of all students may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

21.4 The College recognises the evolving risks associated with emerging technologies, including artificial intelligence. This includes the potential for AI to be used to generate or manipulate images or content (for example, deepfakes), which may be used to harm or exploit children. Staff will remain vigilant to these risks and respond in accordance with this policy.

21.5 The College's approach to online safety is set out in the College's Online safety policy and ICT Usage Policy

[19] Section 36 of the Children's Wellbeing and Schools Act 2026 requires schools in England to have regard to published guidance on mobile phones. This gives the guidance on mobile phones in schools the force of law. The provision comes into force on 29 June 2026. Schools must implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. There are a number of ways in which schools can ensure that they are mobile phone-free, and it is for headteachers to decide how best to achieve this within their own unique contexts.

22 Training

22.1 The College ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles[20].

22.2 The level and frequency of training depends on the role of the individual member of staff.

22.3 The College maintains written records of all staff training.

22.4 All training will be carried out in accordance with Lambeth Safeguarding Partners procedures where possible.

22.5 **Induction**

22.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(a) this policy;

(b) the role, identity and contact details of the DSL and his / her Deputy;

(c) the Behaviour, discipline and exclusions policy for students;

(d) the Anti-bulling policy, which includes details of the College's policy on cyberbullying and prejudice-based and discriminatory bullying;

(e) the staff Code of Ethical and Professional Conduct including the Whistleblowing policy / ADC IT acceptable use policy / Staff conduct policy / Low level concerns policy / Staff social media policy;

(f) the safeguarding response to children who are absent from education, particularly on repeat occasions and / or prolonged periods;

(g) the College's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as well as information on cyber security;

(h) safeguarding training in accordance with Lambeth Safeguarding Partners' procedures including guidance on managing a report of child-on-child abuse (including sexual harassment and sexual violence);

(i) a copy of Part 1 and, where appropriate, Annex A of KCSIE for College leaders and those who work directly with children; and

(j) appropriate Prevent duty training.

22.6 **Safeguarding training**

[20] To reflect good practice the College may wish to check that its policies and procedures include reference to training provided to its staff to ensure that they have a basic understanding of safeguarding, including the identity of the College's DSL

22.6.1 All staff and College leaders will receive a copy of this policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.[21]

22.6.2 Members of the SLT (including the Principal) and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all of KCSIE.

22.6.3 The Principal and all staff members will undertake appropriate safeguarding training which will be updated at least annually and following consultation with the Lambeth Safeguarding Partners[22]. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email, and staff meetings on a regular basis and at least annually.

22.6.4 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the College, measures in place to combat cybercrime, the College's approach to the use of generative AI by students and for educational purposes, searching students for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the College.

22.6.5 Additionally, the College will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse (including sexual harassment and sexual violence), harmful sexual behaviour[23], child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children and children in kinship care safe.

22.6.6 All boarding staff will receive enhances safeguarding training relevant to the boarding context.

22.6.7 All Governors receive safeguarding training (including online safety) on induction.[24] This training will equip with the knowledge to provide strategic challenge to test and assure themselves that the College's safeguarding policies in place are effective and support a robust whole college approach to safeguarding. This training will be regularly updated.

22.6.8 The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

[21] VWV plus offer a package of different courses including safeguarding and KCSIE part 1. Please let us know if you would like any further information remove when the next version of KCSIE is in force.
[22] How regular the training should be undertaken must be in accordance with the Local Safeguarding Partners' advice. This sentence should be completed as appropriate.
[23] The College should be aware of the research conducted by the Lucy Faithful Foundation, Everyone's Safer, and ensure that teachers and safeguarding leads and provided with ongoing training, emotional support and practical tools to manage harmful sexual behaviour confidently and consistently. The Lucy Faithful Foundation and the Centre of Expertise on Child Sexual Abuse have useful training, guides and templates
[24] Governors or trustees should also consider assigning a digital link role within the governing body or board of trustees in line with the DfE's Digital leadership and governance standards as well as to assign an individual within the governing body or board of trustees who focuses on pupil attendance issues.

22.6.9 The College has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time.

22.6.10 **Designated Safeguarding Lead** (**DSL**)

(a) The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.

(b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex B of KCSIE.

(c) Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, maintained) for further details.

22.6.11 **Teaching students about safeguarding**

(a) The College teaches students about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

(b) The College recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

(c) Students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through RSE and PSHE education appropriate to their age and stage of development. The content will be relevant, include scenario-based learning[25] and tackle issues such as: healthy and respectful relationships, boundaries and, consent, stereotyping, prejudice and equality, body confidence and self-esteem, promoting healthy and positive masculinities,[26] how to recognise abusive relationships, including coercive and controlling behaviour[27], concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, honour or faith-based violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable and online harms such as making or sharing nudes and semi-nudes, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

[25] Recommended in Everyones_safer_year_3_report.pdf
[26] Recommended in Everyones_safer_year_3_report.pdf
[27] The Home Office publish guidance on Controlling or coercive behaviour which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

(d) Where lessons are delivered by external agencies, the College should agree in advance of the session how a safeguarding concern would be dealt with by the external visitor.[28]

(e) Students are given the opportunity to talk about safeguarding issues within the classroom environment and provide feedback on the content and effectiveness of training given.[29] Students are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The College's complaints procedure for students sets out in writing what students should do if they have a worry or complaint.

(f) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that students learn how to keep themselves safe on-line and when accessing remote learning. The Proprietor of the College has ensured appropriate filters and monitoring systems are in place and meet the DfE's filtering and monitoring standards (see the Online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

(g) The College keeps in regular contact with parents and carers to reinforce the importance of students being safe online and make them aware of the systems in place to filter and monitor online use and the sites students will be expected to access during learning.

23 Monitoring and review

23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the College's safeguarding arrangements.

23.2 Any safeguarding incidents at the College will be followed by a review of these procedures by the DSL and a report made to the Proprietor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

23.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.4 The Proprietor will also undertake an annual review of this policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, including checks that filtering is working appropriately on all internet-connected

[28] The July 2025 update to the statutory guidance on Relationships Education, Relationships and Sex Education (RSE), and Health Education introduces more rigorous expectations around the use of external organisations and materials. Schools must ensure all resources and contributors are subject to thorough vetting processes, with safeguarding arrangements agreed in advance of any engagement. Please refer to paragraph 84.

[29] Recommended in Everyones_safer_year_3_report.pdf

devices in all relevant locations, supported by an annual risk assessment that considers and reflects the risks its students face and a record kept.

23.5 The DSL will work with the Nominated Safeguarding Governor to prepare a written report commissioned by the Proprietor. The written report should address how the College ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled, including lessons learned; and the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

23.5.1 inspection of records or feedback from external agencies including the Designated Officer(s);

23.5.2 reports of ISI inspections;

23.5.3 the outcome of any relevant complaints, claims or related proceedings; and

23.5.4 press reports.

23.6 The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled by the College. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 a clear and comprehensive summary of the concern;

24.1.2 details of how the concern was followed up and resolved; and

24.1.3 a note of any action taken, decisions reached and the outcome.

24.2 The information created in connection with this policy may contain personal data. The College's use of this personal data will be in accordance with data protection law. The College has published on its website privacy notices which explain how the College will use personal data.

24.3 All records created in accordance with this policy are managed in accordance with the College's policies that apply to the retention and destruction of records.

24.4 Insofar as student records are concerned:

24.4.1 Staff are trained on the College's safeguarding record keeping systems. Guidance on record keeping is set out in Appendix 2.

24.4.2 The DSL is responsible for managing all child protection files in accordance with KCSIE.

24.5 **Information sharing and multi-agency working**

24.5.1 The College will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The College will always act in order to safeguard and promote the welfare of others.

24.5.2 The College understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of students, which is always the College's paramount concern. Schools and colleges have clear powers to share, hold and use information for these purposes and data protection laws provide a framework to ensure that personal information is shared appropriately.

24.5.3 When the College intends, as a result of a professional or legal duty, or otherwise, to share safeguarding information, the College will always seek to inform the student, their parent(s) or carer(s) about what information sharing has taken (or will take) place, why and how the information will be used, unless doing so could put a child or others at further risk of harm, or could compromise effective safeguarding arrangements, including police investigations.

24.5.4 When deciding what information to share the College will consider:

(a) the relevancy of the information, including to the current safeguarding risk,

(b) what is necessary for the receiving setting to know, and

(c) whether it is clearly presented and appropriately contextualised.

24.5.5 The College will use professional judgement to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes.

24.5.6 When the College receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the College will carefully consider its response to make sure that any disclosure is in accordance with its obligations under data protection laws. Where a request for safeguarding information is received from a parent for an individual aged under 18, the College may be exempt from providing that data where complying with the request would not be in the best interests of the child. The College will also have regard to its data protection policies. The College's Data Protection Lead will work with the DSL as appropriate to determine what should be disclosed.

24.5.7 The College will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

24.5.8 Where a student leaves the College to attend a new setting, the DSL will consider if it would be appropriate to share any information with that setting, particularly where the information would support an assessment of risk to others as well as the individual student.

24.5.9 Where allegations have been made against staff, the College will consult with the Designated Officer(s) and, where appropriate, the police and children's social care,

or adult social care where appropriate, to agree the information that should be disclosed and to whom.

24.5.10 While the College will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

25 Version control

Date of adoption of this policy	August 2026
Date of last review of this policy	August 2025
Date for next review of this policy	August 2027
Policy owner (SMT)	Designated Safeguarding Lead
Policy owner (Proprietor)	Gareth Evans

Appendix 1 Forms of abuse, neglect and exploitation and specific safeguarding risks

1 Abuse, neglect and exploitation

1.1 Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Indicators of abuse and neglect

2.1 **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, where they see, hear or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. This includes in teenage relationships, or under the guise of honour-based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

2.4 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The College policy and procedures can be found in Appendix 3.

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

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the student says he / she has been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a student's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the student's behaviour;

3.1.4 the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the student's development is delayed, the student loses or gains weight or there is deterioration in the student's general well-being;

3.1.6 the student appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the student is reluctant to go home, or has been openly rejected by his / her parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.

3.3 The Lambeth Safeguarding Partners can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific safeguarding issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 sponsored students (see section 5 below);

4.1.2 boarding students (see section 6 below);

4.1.3 child abduction and community safety incidents;

4.1.4 children and the court system;

4.1.5 children missing from education (see section 7 below);

4.1.6 children with family members in prison;

4.1.7 elective home education (EHE) (see section 8 below);

4.1.8 child criminal exploitation and child sexual exploitation (see section 9 below);

4.1.9 county lines (see section 10 below);

4.1.10 serious violence (see section 11 below);

4.1.11 modern slavery and the national referral mechanism;

4.1.12 cybercrime; (see section 12 below)

4.1.13 domestic abuse (see section 13 below);

4.1.14 homelessness;

4.1.15 mental health (see section 14 below);

4.1.16 honour or faith-based abuse (including Female Genital Mutilation and Forced marriage) (see sections 15, 16 and 17 below);

4.1.17 preventing radicalisation (see section 18 below);

4.1.18 child-on-child abuse (including sexual harassment and sexual violence) (see Appendix 3);

4.1.19 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);

4.1.20 making or sharing nudes and semi-nudes (see section 21 below);

4.1.21 upskirting (see section 22 below);

4.1.22 children who are lesbian, gay or bisexual (see section 26 below);

4.1.23 children who are questioning their gender (see section 27 below);

4.1.24 misinformation / disinformation (see section 28 below);

4.1.25 young carers (see section 29 below);

4.1.26 children with medical conditions (see section 30 below).

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Sponsored Students

5.1 Some of our students hold visas (typically Child Student visas) which are sponsored by the College under a licence granted by UKVI. These students may be living far away from their families, having to adapt to what may be a very different culture, and may also encounter difficulties in communicating in English or reaching their parents due to time zone differences. The College recognises the additional safeguarding risks associated with these students and the additional duties imposed by virtue of its status as a licensed sponsor. In addition to the requirements set out in KCSIE and the NMS for Boarding Schools, the College will ensure that appropriate and safe care arrangements are in place, in line with Immigration Rules and UKVI's Student Sponsor Guidance. There is respect for diversity and sensitivity to race, culture and religion, alongside the other protected characteristics.

6 Boarding Students

6.1 In line with KSCIE and the NMS for Boarding Schools, we will ensure that boarding accommodation is safe, secure, and subject to 24-hour supervision, with clear boundaries that respect students' privacy while enabling staff to fulfil their safeguarding responsibilities. Boarding students are expected to sign in and out, to abide by an age-appropriate curfew and have daily welfare checks and regular opportunities to meet privately with pastoral staff and information is shared appropriately with the DSL who retains overall responsibility for the welfare of these students while they are in our care. The DSL will manage any concerns with reference to the student's home local authority safeguarding arrangements and will liaise with parents and /or a named guardian, where appropriate.

6.2 We recognise that these students may face additional safeguarding challenges due to their separation from their parents and carers and as a result of living away from home. For these children, the risk of bullying (both in person and online), child on child abuse (including sexual harassment and sexual violence), inappropriate relationships and emotional isolation is greater and strong allegiances or blind spots can develop which risk creating a dynamic of power and control that can be abused.

We have clear rules of acceptable conduct for staff and students which relate to the boarding context and include reference to local risks outside the College grounds. We provide additional training on maintaining effective relationships and on how to recognise and report behaviour of concern to boarding staff and students. Boarders are empowered to raise concerns and make suggestions for changes and improvements, which are taken seriously, and we offer a range of ways for concerns to be reported, which include access to an independent listener, separate from the College, if preferred. Unless specifically agreed in advance, the College is not responsible for exeat weekends, half-term and holiday arrangements, particularly accommodation.

6.3 The College ensures that arrangements for international boarders who may have additional language or cultural needs are specifically considered, whether or not their place is sponsored by the College.

7 Children who are absent from education

7.1 Children being absent from school, particularly repeatedly and / or for prolonged periods and children missing education, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith-based abuse or risk of forced marriage. College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a student from the College gives rise to a concern about their welfare.

7.2 Where reasonably possible the College will hold more than one emergency contact for each Student.

7.3 The College shall inform the local authority of any student who is going to be added to or deleted from the College's admission register outside of standard transition times in accordance with the requirements of the School Attendance (Pupil Registration) (England) Regulations 2024.

7.4 This will assist the local authority to:

7.4.1 fulfil its duty to identify children of compulsory school age who are missing from education; and

7.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

7.5 The College shall provide the local authority with the names and addresses of all students of compulsory school age who:

7.5.1 fail to attend College regularly; or

7.5.2 have been absent for a continuous period of ten school days where their absence has been recorded with one of more of the codes statistically classified as unauthorised (G,N,O and/or U). The frequency will be determined by the local authority, but no less frequently than once per calendar month;

7.5.3 have been recorded with code I (illness) and who the College has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness in a school year.

8 Elective Home Education (EHE)

8.1 Where a parent expresses their intention to remove a student from school with a view to educating at home, the College will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

9 Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)

9.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

9.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

9.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and / or

9.1.3 through violence or threat of violence to victims (and their families).

9.2 Children can be exploited by adult males or females, as individuals or in groups, including organised networks or gangs which the victim may identify as being a part of. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

9.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.[30]

9.4 International students may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their parent(s) or legal guardian, and schools which hold a Child Student sponsor licence may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.

9.5 Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

9.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

[30] Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

9.7 Some of the following can be indicators of both CSE and CCE, including children who:

9.7.1 appear with unexplained gifts, money or new possessions;

9.7.2 associate with other young people involved in exploitation;

9.7.3 suffer from changes in emotional well-being;

9.7.4 misuse drugs and alcohol;

9.7.5 go missing for periods of time or regularly come home late; or

9.7.6 regularly miss school or education or do not take part in education.

9.8 Children who have been exploited will need additional support to help maintain them in education.[31]

9.9 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

9.10 CSE does not always involve physical contact; it can also occur through the use of technology, including through generative AI and AI-generated nudes or semi-nudes (deepfakes). CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

9.10.1 have older boyfriends or girlfriends; or

9.10.2 suffer from sexually transmitted infections or become pregnant.

10 County lines

10.1 County lines [32] is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

10.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

10.3 Number of the indicators for CSE and CCE as detailed above (and in Annex A of KCSIE) may also be applicable to children involved in county lines.

[31] For more information and resources see Baroness Casey's June 2025 National Audit on Group-based CSE and abuse, The Children's Society and The Centre of Expertise on Child Sexual Abuse.
[32] See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

10.4 Additional reporting duties:

10.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;

10.4.2 where a student may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism [33] should be considered.

11 Serious violence

11.1 Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

11.2 Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL who will assess the risk to both the individual student and others in the College, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant consider action to de-escalate peer conflict.

11.3 Indicators which may signal children are at risk from, or are involved in serious violence may include:

11.3.1 Increased absence from school;

11.3.2 a change in friendships or relationships with older individuals or groups;

11.3.3 a significant decline in educational performance;

11.3.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries; and

11.3.5 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

11.4 Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. The College should also try to be alert to when children might be at highest risk, recognising that violence can often peak in the hours just before or just after College, when students are travelling to and from College and can concentrate in particular places.

11.5 Staff should also be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been suspended, spent time in alternative provision or permanently excluded, having experienced child maltreatment, having been involved in offending, such as theft or robbery,

[33] For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and Home Office guidance: Trafficking: safeguarding children

having used drugs or alcohol in early adolescence and having previously been a victim or previously perpetrated violence.

11.6 Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

11.7 Further advice for schools is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) (the "what works centre for preventing violence") has produced practical guidance for schools and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence**.**

12 Cybercrime

12.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

12.2 Cyber-dependent crimes include:

12.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

12.2.2 denial of Service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

12.2.3 making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

12.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

12.4 The College will put in place appropriate measures to meet the Cyber security standards in order to combat cyber attacks and improve cyber resilience.

12.5 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide preventative programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

13 Domestic abuse

13.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but not limited to physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional, or other abuse such as honour or faith-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking.

13.2 Children can be victims of domestic abuse. They may see hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

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

13.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex A of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children[34].

14 Mental health[35]

14.1 Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide.

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

14.3 Potential warning signs could include:

14.3.1 significant changes in behaviour

14.3.2 ongoing difficulty sleeping

14.3.3 withdrawing from social situations

14.3.4 not wanting to do things they usually like, and

14.3.5 physical signs of self-harm or neglecting themselves

14.4 Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

14.5 If staff have a concern about a child's mental health, they should speak to the DSL. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child

[34] In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. More information about the scheme can be found in the statutory guidance for police: Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass.

[35] The NHS Every Mind Matters website contains helpful information and advice about looking after a child's mental health. In addition, the Hub of Hope is the UK's leading mental health support database. It brings local, national, peer, community, charity, private and NHS mental health support and services together in one place, so that anyone struggling can find the most appropriate support.

needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

15 Honour or faith-based abuse

15.1 Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff must be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. Staff should speak to the DSL if they have any doubts.

15.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

16 Female genital mutilation (FGM)

16.1 FGM is a form of honour or faith-based abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

16.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

16.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

16.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

16.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the College's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

17 Forced marriage

17.1 Forced marriage is also a form of honour or faith-based abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

17.2 Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial "marriages" as well as legal marriages.

17.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the multi-agency guidelines: handling case of forced marriage (HM Government, April 2023).

17.4 Staff should speak to the DSL if they have any concerns. Pages 79-84 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

18 Radicalisation and the Prevent duty

18.1 The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

18.2 The College aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The College is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

18.3 The College has adopted the government's definitions for the purposes of compliance with the Prevent duty:

18.4 **Extremism:** *"the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

18.4.1 negate or destroy the fundamental rights and freedoms of others; or

18.4.2 undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

18.4.3 intentionally create a permissive environment for others to achieve the results in (1) or (2).”

18.5 **Radicalisation:** "*the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*"

18.6 **Terrorism**: "*an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause*."

18.7 Although there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

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

18.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023) The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting students at risk.

19 Child-on-child abuse (including sexual harassment and sexual violence)

19.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

19.2 The College's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

20 Online safety

20.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

20.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

20.3.1 **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

20.3.2 **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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.

20.3.3 **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual making or sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying); and

20.3.4 **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

21 Making or sharing nudes and semi-nudes

21.1 Consensual and non-consensual making or sharing of nudes and/or semi-nudes can be signs that children are at risk.

21.2 The College treats all incidences of making or sharing nudes and semi-nudes as a breach of discipline and also as safeguarding matters to be actioned in accordance with this policy, regardless of whether they are consensual or non-consensual. All such incidents will require a proportionate approach that considers the age[36], development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

21.3 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

21.4 The DSL may in exceptional circumstances view images with the prior approval of the Principal and only where:

[36] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal, whilst non-consensual is illegal and abusive.

21.4.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

21.4.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the student or parent in making a report; or

21.4.3 a student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the College's devices or network.

21.5 Where viewing an image is unavoidable:

21.5.1 viewing should take place on College premises wherever possible;

21.5.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

21.5.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

21.5.4 full details of the viewing must be recorded in the College's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

21.5.5 any member of staff who views an indecent image should be given appropriate support.

21.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

21.7 If an electronic device that is prohibited by the College rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

21.8 If external agencies do not need to be involved, the College must consider the deletion of any images. Students should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

21.9 If images have been shared online and cannot now be deleted by the person who shared them, the College should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

21.10 Where a student receives unwanted images, the College should advise the Student and his / her parents of options that may be available to block the sender or to change the student's mobile phone number or email address.

21.11 The UK Council for Internet Safety's advice note Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024) contains details of support agencies and provides further

information for schools on how to responding to incidents of sharing nudes and semi-nudes.

22 Upskirting

22.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission 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. Anyone of any gender can be a victim.

22.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

22.3 The College will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the College's child protection procedures.

22.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to making or sharing nudes and semi-nudes / sexting.

23 Special educational needs and disabilities or physical health issues

23.1 The College welcomes students with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the College's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the College's policy on special educational needs and learning difficulties and disability policy.

23.2 Additional barriers can exist when detecting the abuse or neglect of students with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The College is mindful in particular that:

23.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's condition without further exploration;

23.2.2 students with SEND or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;

23.2.3 some students with SEND may be unable to understand the difference between fact and fiction in online content (including AI generated content) and can repeat the content / behaviour in College without understanding the consequences;

23.2.4 there is a risk of students with SEND not understanding that what is happening to them is abuse;

23.2.5 these students are more likely to be dependent on adults for care and to require intimate care; and

23.2.6 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

23.3 The College should consider providing extra pastoral support and attention for these Students, along with ensuring any appropriate support for communication is in place.

24 Looked after children and previously looked after children

24.1 The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

24.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

24.1.2 contact arrangements with birth parents or those with parental responsibility;

24.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

24.2 The DSL maintains these details, including contact details of the child's social worker. See 6.5.4 in the policy for the DSL's role in relation to students who are looked after children.

25 Care leavers

25.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

26 Children who are lesbian, gay, or bisexual

26.1 A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, the College recognises that they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

26.2 LGBT inclusion is taught as part of the statutory relationship's education /RSE / PSHE curriculum.

26.3 All staff are aware of these vulnerabilities and the College endeavours to provide a safe space to speak out or share concerns.

27 Children who are questioning their gender

27.1 The College recognises that some children and young people may question their gender, including how they feel about the physical attributes of their sex and how they fit into society. The College also recognises that it is not uncommon for children, particularly at a younger age, to explore interests, behaviours or

expressions that may not align with gender stereotypes, and that for many children this may be a temporary phase.

27.2 The College will take a supportive, child-centred approach, seeking to understand the child's views, wishes and feelings, and exercising appropriate professional curiosity in relation to their wider circumstances. This includes being alert to any potential safeguarding considerations, such as:

27.2.1 mental health or emotional wellbeing needs;

27.2.2 experiences of bullying (including discriminatory or prejudice-based bullying);

27.2.3 family, peer or social pressures; and

27.2.4 any other vulnerabilities that may impact on the child's welfare.

27.3 The College will ensure that it remains a respectful environment in which all students feel safe and are able to express themselves. All forms of bullying, including bullying related to gender, gender expression or identity, are unacceptable and will be addressed promptly in accordance with the College's Behaviour, Discipline and Exclusion Policy and anti-bullying policies.

27.4 The College will seek to maintain an environment that avoids unnecessary gender stereotyping and supports inclusion, while also ensuring that safeguarding, welfare, safety and fairness considerations are appropriately balanced.

27.5 Where a request is made in relation to social transition, the College will consider this in accordance with its Gender Questioning Children and Social Transition Policy which sets out the College's approach to decision-making, including the factors to be taken into account and the processes to be followed. The College will not initiate action in relation to a child questioning their gender. This policy applies where a child or their parent raises a request in relation to social transition, and the College is responding to that request.

28 Misinformation / disinformation

28.1 The College recognises that misinformation, disinformation and conspiracy theories may present safeguarding risks, particularly where they contribute to harm, radicalisation or exploitation. Staff will be alert to these risks and respond appropriately.

29 Young carers

29.1 The College recognises that caring responsibilities can impact on their attendance attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

30 Children with medical conditions

30.1 A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater

safeguarding risk. In the event of a clinical incident taking place, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

Appendix 2 Concerns about a child - guidance for staff

1 **Receiving a disclosure**

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a student if they disclose something which suggests that a criminal offence may have been committed - the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

1.3 Take the student to the College Matron if there is a medical need and do not examine the injury yourself.

1.4 Reassure the student they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.7 Pass on the record when reporting the concern in accordance with this policy.

2 **Recording a concern**

2.1 Staff must record all concerns in writing and consistently with the College's system for recording safeguarding concerns.

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the student's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event/concern / conversation;

2.2.4 details of how the concern was followed up and resolved,

2.2.5 a note of any action taken and by whom, decisions reached and the outcome;

2.2.6 the name and position of the person making the record.

2.3 The College has an electronic recording system, MyConcern, which should be completed and passed on when reporting the matter in accordance with this policy. Staff can access this system via the staff dashboard. The record can be completed

after an initial discussion with the DSL and completed with the DSL where appropriate.[37]

3 Use of restrictive interventions, including the use of reasonable force

3.1 There are circumstances when it is appropriate for staff to use restrictive interventions, including the use of reasonable force, seclusion and restraint, to safeguard students and others. All members of staff have a legal power to use reasonable force in certain circumstances. In all cases, "Reasonable" means using no more force than is necessary, for the least amount of time required to address the risk.

3.2 Staff should refer to the College's Behaviour, discipline and exclusions policy, Staff Handbook and the Physical Restraint Policy for more detailed guidance about the use of restrictive interventions.

[37] The CSA Centre has produced a 'Signs and Indicators' template that you may find useful.

Appendix 3 Dealing with allegations of child-on-child abuse (including sexual harassment and sexual violence)

1 Child-on-child abuse

1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying, and faith-based prejudice or faith- or race-based discrimination);

1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);

1.1.3 physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4 physical assault and harm, or the threat of harm with a weapon;

1.1.5 harmful sexual behaviour, including misogyny, sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.6 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.7 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

1.1.8 consensual and non-consensual making or sharing of nudes and semi-nudes;

1.1.9 upskirting, typically involving taking a picture under a person's clothing without their permission, 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;

1.1.10 initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).

2 The College's approach to child-on-child abuse

2.1 Staff understand that, even if there are no reports of child-on-child abuse at the College, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns (whether these concerns are thought to have taken place on or off-site) regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The College will adopt a zero-tolerance approach to abuse.[38] Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward.

2.3 All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is also recognised that such behaviour is preventable, and that early intervention is key.

2.4 All staff should challenge inappropriate behaviour, including sexism and misogyny, between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with this policy and / or the College's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

2.5 Appropriate action will involve supporting all members of the College community who may be involved as a priority. This may require investigation by the College or other agencies. Until investigations have been undertaken and findings made, the College will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at the College, or when the student involved was under the College's care and whether or not the student is under 18, as an issue which may impact student welfare. Disciplinary action will follow separately, if appropriate.

2.6 The College will ensure students impacted by child-on-child abuse are made aware of appropriate support resources that are available to them.

3 Harmful sexual behaviour (HSB), sexual violence and sexual harassment (SVSH)

3.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. [39]

3.2 The College adopts a whole-college approach to preventing harmful sexual behaviour, sexual violence and sexual harassment, underpinned by its safeguarding, behaviour and pastoral systems. This includes:

3.2.1 promoting a culture of kindness, respect and equality;

[38] This wording reflects KCSIE, but schools should be aware of the research undertaken by the Lucy Faithfull Foundation, Everyone's Safer which concludes that these approaches may deter disclosure, particularly when students fear harsh sanctions or feel their peers will be stigmatised and consider how to address this

[39] Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning. Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour.

3.2.2 identifying and addressing sexism, misogyny, homophobia and harmful stereotypes;

3.2.3 ensuring staff model positive behaviour and challenge harmful attitudes appropriately, including challenging ideas without stigmatising individuals.

3.3 Where the misconduct may constitute harmful sexual behaviour (HSB), sexual violence[40] (rape, assault by penetration, sexual assault[41] or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

3.4 Whilst any report of HSB, sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of HSB and SVSH and more likely it will be perpetrated by boys.

3.5 SVSH can occur between two or more children of any age or sex from primary to secondary stage both inside and outside of the College. It can also occur online[42]. It can also occur through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. Addressing inappropriate behaviour, including sexism and misogyny, (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating HSB. The College also recognises the escalatory nature of misogyny and the benefits of early intervention to support its approach to minimising the risk of HSB, sexual harassment and sexual violence.

3.6 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The College acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child-on-child SVSH

4.1 The initial report

4.1.1 The College recognises that it is not easy for children to tell staff about abuse and that instead, they may show signs or behave in ways that signal distress. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2 The College acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of HSB

[40] When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

[41] Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault).

[42] Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

and SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3 They should:

(a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

(b) where possible they should ask open questions about whether student(s) have been harmed, the nature of the harm or if they may be at risk of harm;

(c) where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child; [43]

(d) explain the next steps and how the report will be progressed;

(e) make a written record of the report (recording the facts as the child has presented them);

(f) inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 **DSL's considerations**

4.2.1 Reports of HSB and SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all of the circumstances into account, in the best interest of the students involved. The College's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 **College's considerations**

4.3.1 The College will consider:

(a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible regarding how an investigation will be progressed and what support they are offered, but their wishes will not always be determinative as the College may have to take action to protect other children;

[43] College staff can search students with their co-operation for any item. If a student refuses to co-operate staff may use reasonable force to search students if they have reasonable grounds for suspecting a student is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case by case basis. See https://www.gov.uk/government/publications/searching-screening-and-confiscation for further information.

(b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether HSB [44]has been displayed;

(c) the ages and developmental stages of the children involved and any imbalance between them, such as differences in age, maturity or social status;

(d) if there is an intimate personal relationship between the children;

(e) whether the alleged incident was isolated or part of a sustained pattern of abuse;

(f) any intrafamilial harm and support for siblings if needed;

(g) whether there are any ongoing risks to those involved;

(h) the time and location of any incident, and any action required to make the location safer;

(i) the wider context, including any links to CSE or CCE.

4.3.2 Before deciding how best to support and protect those involved the College will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded, used to inform ongoing safeguarding decisions and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The College will make a proportionate response to these matters in light of the circumstances and the factors identified above. And decide, if any, further action is appropriate.

4.3.4 The College will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.[45]

5 Investigations and findings

5.1 The College will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the College to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances whether this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim

[44]Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here as well as the Lucy Faithfull Foundation HSB toolkit and the Fearless resource on child sexual abuse and harmful sexual behaviour. KCSIE 2026 also sets out considerations for assessing HSB.

[45] The Lucy Faithfull Foundation and the Home Office have developed Shore Space, an online confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour which schools may find helpful.

statement. In those circumstances the College should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

5.2 The College should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral, restorative response and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/ or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Raising allegations and low-level concerns

1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low-level concern under this policy.

DSL Gareth Evans	07384 598516 gareth.evans@dld.org
Principal James Kidd	07717 894425 james.kidd@dld.org
Chair of Governors Tim Haynes	07738 236899 Tim.haynes@abbeydld.co.uk
Nominated Safeguarding Governor(s) John Withers	07799 661137 John.withers@abbeydld.org
LADO Ed Snelgar	07720 828 700 lado@lambeth.gov.uk

2 Purpose and application

2.1 **Purpose:** the College takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person.
We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the College.

2.2 **Application:** the Policy applies to all adults working in or on behalf of the College (whether on a paid or unpaid basis), including governors, supply staff, trainee teachers, volunteers and contractors (**Staff**).

2.3 **Other adults:** although this policy directly relates to those who work for the College, the College recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the College. Should concerns be raised about people who are not Staff or students, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

2.4 **Statutory guidance:** this policy has regard to the following statutory guidance:

2.4.1 *Keeping children safe in education* (September 2026) (**KCSIE**). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, trainee teachers, volunteers and contractors, who are all adults working for, or on behalf of, the College. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(a) concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and

(b) allegations that may meet the harm threshold.

2.4.2 *Working together to safeguard children 2026* **(WTSC**), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff duties

3.1 **Staff behaviour:** all Staff must comply with the College's Staff Conduct Policy which sets out appropriate and expected standards of behaviour.

3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the College). This includes any concern however it arises, for example, behaviour you have witnessed, a concern raised with you by a colleague, student, parent or another adult, or as a result of checks or information brought to your attention.

3.3 **Duty to self-refer:** you must refer yourself to the Principal where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 **A culture of sharing:** All Staff have a positive obligation to support the College's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

4.2 **Low level concerns:** a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside of work. No concern is too small or minor to raise under this policy.

4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or

4.3.2 possibly committed a criminal offence against or related to a child; and / or

4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or

4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the College which creates a transferable risk.

4.4 **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";

4.4.2 the Children Act 1989 defines:

(a) "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill treatment of another]";

(b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

(c) "health" as "physical or mental health".

5 How to raise concerns and allegations

5.1 **Raising low level concerns:** Where you have a low-level concern in respect of any member of Staff, you must report the matter immediately. You can raise this with the Principal or with the DSL. The contact details are at section 1 of this policy.

5.2 **Duty of the DSL to refer concerns to the Principal:** the Principal remains the ultimate decision-maker in respect of all low-level concerns. Save for in cases involving the Principal or the DSL must therefore promptly report any concern raised with them to the Principal. Wherever possible the DSL must speak to the Principal in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Principal in person about the concern, DSL must email the Principal with a summary of the concern on the same day the concern is raised.

5.3 **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the Principal) whether this is a low-level concern or an allegation of harm that may meet the harm threshold you must raise this immediately with the Principal.

5.4 **Concerns involving the Principal and conflicts of interest:** where you identify a concern about the Principal, you must report the matter immediately to the Chair of Governors without first notifying the Principal. Where there is a conflict of interest in raising the concern with the Principal you must report the concern directly to the Local Authority Designated Officer (**LADO**), without first notifying the Principal. Details of the LADO can be found at the start of this policy.

5.5 **Concerns involving Governors:** where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.

5.6 **Concerns involving individuals / organisations using College premises:** where the College receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.

5.7 **Reports to the DSL:** If it is not possible for you to make a report to the Principal or Chair of Governors or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor.

6 The College's response to concerns and allegations

6.1 **Appropriate action:** the College will ensure that appropriate action is taken to address concerns that are raised under this policy.

6.2 **Assessing concerns:** The Principal (or, if the concern relates to the Principal, the Chair of Governors or the Nominated Safeguarding Governor will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, Principal, the Chair of Governors and the Nominated Safeguarding Governor have all been trained to assess concerns, and to record and address them appropriately.

6.3 **Low level concerns:** If the College determines the concern is a low-level concern, then the College will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the College's capability or disciplinary procedures.

6.4 **Borderline cases:** the Principal, (or, if the concern relates to the Principal, the Chair of Governors or the Nominated Safeguarding Governor may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

6.5 **Referral:** where the Principal (or, if the concern relates to the Principal, the Chair of Governors) considers the concerns raised potentially meet the harm threshold, the

Principal (or, if the concern relates to the Principal, the Chair of Governors or the Nominated Safeguarding Governor) will make a report to the LADO before further action is taken. The Principal (or, if the concern relates to the Principal, the Chair of Governors) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

6.6 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the College will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The College will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

6.7 **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the College to lead the investigation. The Case Manager will be either the Principal or a person with appropriate authority appointed by the Principal. Where the Principal is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or the Nominated Safeguarding Governor.

7 Disclosure of information about concerns and allegations

7.1 **Informing the individual of a concern:** the College will in most cases inform the individual concerned about any low-level concern that is raised about them.

7.2 **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

7.4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

7.5 **Reporting restrictions:** the College is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

7.6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents

or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7.7 **Concerns about supply staff, trainee teachers and contractors:** where a concern / allegation has been made in respect of a member of supply staff, a trainee teacher placed within the College or a contractor, the College recognises that it shares safeguarding responsibilities with the relevant employing agency, teacher training provider or contracting organisation. The concern / allegation will be notified to the individual's employer or the teacher training provider, and the College will work with them to ensure that any investigation and safeguarding response is appropriately coordinated. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

8 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)

8.1 ***Report to the DBS:*** *the College is under a legal duty to make a referral to the DBS where:*

- *an individual has applied for a position at the College despite being barred from working with children; and /or*
- *an individual (including a volunteer) has been removed by the College from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, or in the case of a volunteer has ceased to volunteer at the College in circumstances where they would otherwise have been removed, because they have:*
  - *satisfied the harm test (as defined in section 35 of the Safeguarding Vulnerable Groups Act 2006);*
  - *committed relevant conduct (as defined in Schedule 3 to the Safeguarding Vulnerable Groups Act 2006); or*
  - *been cautioned for, or convicted of, a relevant offence (as defined in paragraphs 1 and 2 of Schedule 1 to The Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Relevant Offences) Regulations 2009).*

8.2 **Report to the Teaching Regulation Agency (TRA):** the College is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The College may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. The TRA will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

9 Record keeping

9.1 **Records of low-level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition all low-level concerns, including those that have not been addressed formally under the College's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

9.2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the College will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.

9.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

9.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored electronically by the DSL and will be accessible by Principal, the Chair of Governors, the Nominated Safeguarding Governor and the DSL only.

9.5 **Malicious or false low-level concerns and allegations:** details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

9.6 **Retention of records:** in line with the College's information and records retention policy, information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the College indefinitely. The College may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

10 References

10.1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the College's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

10.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The College will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

11 Questions

11.1 **Contact:** please contact DSL if you have any questions about this policy.