South Thames Colleges Group

Carshalton College | Kingston College | Merton College | South Thames College

South Thames Colleges Group

Safeguarding Children and Adults at Risk Policy

Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Director – Student Services
Version: Final, subject to Governor Approval	Approval Date: September 2026

South Thames Colleges Group

Carshalton College | Kingston College | Merton College | South Thames College

Contents **Page**

1.Introduction 3

2. Purpose 5

4. Main Elements 8

5. Missing Education and Attendance 13

7. Whistleblowing 17

8. Safer Working Practice 18

14. Work based learning (Apprenticeships) 23

15. Work experience 23

20. Access to the policy 26

Appendix 1 All staff at STCG are required to read Part 1 (in full). Link Here. **28**

Appendix 2: Group Roles and Responsibilities 28

Appendix 3: Actions where there are concerns about an Adult at Risk

Appendix 4: Operational flowcharts

1. Introduction

1.1 South Thames Colleges Group recognises that safeguarding, inclusion, wellbeing and educational outcomes are intrinsically linked. Effective safeguarding is not solely about responding to risk or harm; it is about creating safe, inclusive and supportive environments where students experience belonging, develop trusted relationships and are able to achieve their full potential. Safeguarding arrangements are therefore designed to identify risk early, remove barriers to participation and learning, and enable positive outcomes for all students.

1.2 The Group adopts a trauma-informed and relational approach to safeguarding, recognising that behaviour may be a response to unmet need, adversity, abuse, exploitation or trauma. Staff are expected to demonstrate professional curiosity, consider the wider context of a student's circumstances and seek to identify concerns at the earliest opportunity.

1.3 The Group is committed to a whole-Group approach to safeguarding, creating a culture of vigilance and ensuring support is provided as soon as concerns emerge. Safeguarding and promoting the welfare of children and adults at risk is everyone's responsibility. The Group requires all staff, governors, volunteers and contractors to act in the best interests of the child, young person or adult at risk and to maintain the attitude that "it could happen here".

1.4 The Group recognises that attendance, engagement, participation, behaviour and achievement can be important indicators of a student's welfare and safety. Improving outcomes for vulnerable students is therefore an important element of effective safeguarding practice.

1.5 The Group will ensure that action is taken to protect and support children, young people and adults at risk who may be vulnerable to abuse, neglect, exploitation, radicalisation or harm. All concerns will be taken seriously, students will be encouraged to seek help, and safeguarding responses will be timely, proportionate and centred on the needs and lived experiences of the individual.

1.6 Safeguarding practice across the Group is underpinned by:

- Early identification and intervention.
- Student voice and lived experience.
- Inclusion and belonging.
- Professional curiosity.
- Multi-agency working.
- Contextual safeguarding.
- Positive relationships, wellbeing and educational achievement.

1.7 South Thames Colleges Group promotes a culture where safeguarding is everyone's responsibility. Students are encouraged to seek help, concerns are acted upon promptly, and staff are supported to exercise professional curiosity and challenge where appropriate. The Group seeks

to create safe, inclusive and supportive environments where students feel listened to, valued and able to thrive.

1.8 The Group recognises that 'Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in the Groups processes and procedures and consequentially enshrined in its ethos.' Keeping Children Safe in Education 2026'.

1.9 Staff are required to understand and fulfil their duties to children and adults at risk in accordance with all relevant legislation, statutory guidance and departmental advice including:

- Children Acts 1989 and 2004
- Children and Social Work Act 2017
- Section 5B of the FGM Act 2003 as inserted by section 74 of the Serious Crime Act 2015
- Sexual Offences Act 2003
- Counter Terrorism and Security Act 2015
- Vulnerable Groups Act 2006
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- The Prevent Duty Guidance 2023: for England and Wales
- Terrorism (protection of premises) Act 2025
- What to do if you are Worried a Child is Being Abused
- Information Sharing: advice for practitioners providing safeguarding services' DfE July 2018

1.10 The Group recognises that the welfare of the student is paramount and that, in accordance with the Equality Act 2010, all students regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation have the right to protection from all types of harm or abuse. Working in partnership with children, adults at risk, their parents, carers and other agencies is essential in promoting the welfare of individuals.

This policy should be read in conjunction with individual College's safeguarding procedures and relevant policies / guidance – notably:

- STCG Values, Our Code of Conduct and Community Statement
- Child-on-Child Abuse, Sexual Violence and Sexual Harassment Procedure.
- Complaints, Compliments and Feedback Policy
- On-Line Safety, Digital Safeguarding and Appropriate Use Policy
- Fitness to Study Policy
- Freedom of Speech & Visiting Speaker Policy
- Inclusion and Learning Support Policy
- Inclusion and Outcomes Policy for Care Experienced Learners.
- Criminal Conviction Policy & Procedure (*applicants and students*)

- Mental Health and Wellbeing Policy
- Student Code of Conduct
- Student Disciplinary Policy and Procedure
- Policy for Low Level Safeguarding Concerns
- Prevent Action Plan
- Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors
- Safer Recruitment Policy
- Safeguarding and External Contractor's Procedures
- Transgender Policy
- Whistleblowing Policy

STCG Policies and Procedures:

- View on Website: Link
- View on STCG (staff) online: Link

2. Purpose

2.1 The purpose of this policy is to set out the Group's commitment, responsibilities and arrangements for safeguarding and promoting the welfare of children, young people and adults at risk and to provide a clear framework for the identification, reporting, management and oversight of safeguarding concerns.

2.2 The policy establishes a whole-Group approach to safeguarding that is underpinned by inclusion, trauma-informed and relational practice, early intervention, professional curiosity and effective multi-agency working. It supports staff to understand their safeguarding responsibilities and the action required when concerns arise.

2.3 The Group recognises that effective safeguarding requires more than responding to incidents of harm. Safeguarding arrangements seek to identify concerns at the earliest opportunity, reduce vulnerability, remove barriers to participation and learning, and ensure students receive the right support at the right time.

2.4 This policy provides clear direction to staff, governors, volunteers, contractors and partner agencies and supports compliance with statutory safeguarding legislation, Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and other relevant safeguarding guidance

2.5 The policy also supports the Group's wider strategic priorities relating to safeguarding, inclusion, wellbeing, participation, achievement and progression and contributes to the creation of safe, supportive and ambitious learning environments in which all students can succeed.

3. Scope

3.1 The policy applies to all students, governors, staff and volunteers working for the Group in all locations where education and training is delivered to children and adults at risk. It applies also to

those situations where students are in a workplace setting undertaking vocational training or studying for vocational qualifications. The policy also covers collaborative provision and staff employed directly by contractors supplying services on behalf of the Group. Subcontractors of educational provision are required to have and adhere to their own safeguarding policies and procedures which are in line with relevant legislation and statutory guidance; these will be quality assured by the Group.

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

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

3.3 Within the Group, safeguarding involves acting to prevent harm and to protect students from maltreatment by physical abuse, sexual abuse, emotional abuse and neglect which may take place inside or outside the home, including online.

3.4 It also covers safeguarding young people and adults from being drawn into committing terrorist-related activities and the importance of early intervention, recognising that a person's susceptibility to radicalisation may be linked to their vulnerability. Section 26 of the Counter Terrorism and Security Act, 2015 places a duty on colleges to have "due regard to the need to prevent people from being drawn into terrorism".

When operating this policy, the Group uses the following accepted governmental definitions of extremism and radicalisation which are:

- *Extremism: 'Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.*

- *Radicalisation: 'the process by which a person comes to support terrorism and forms of extremism leading to terrorism'.*

3.5 Safeguarding and promoting the welfare of young people is a broader term than child protection. It includes protecting young people from maltreatment, whether within or outside the home, preventing impairment of mental and physical health or development to ensure young people can grow up in safe circumstances. It also encompasses specific issues such as student health and safety; serious violence; child-on-child abuse; (including bullying sexual violence; sexual harassment; harmful sexual behaviour), arrangements to meet medical need; provision of first aid; college security; access to and use of information technology.

3.6 A 'child' is defined as a person aged up to 18. The Group recognises that safeguarding concerns can affect any child, young person or adult at risk. However, some students may face additional safeguarding vulnerabilities and barriers to disclosure

Staff should be particularly alert to students who:

- have special educational needs and/or disabilities (SEND)
- have a social worker
- are Care-Experienced
- are known to the Youth Justice Service
- are eligible for Free School Meals
- are young carers
- experience mental health difficulties
- experience domestic abuse
- are vulnerable to exploitation
- are missing education
- are at risk of serious violence
- have housing instability or homelessness
- are subject to discrimination or hate incidents
- identify as LGBT+ or are perceived to be LGBT+
- experience online harm

3.7 The presence of one or more vulnerability factors does not indicate abuse has occurred but may increase risk and require additional support and monitoring.

3.8 An adult at risk is defined as "a person aged 18 or over who is or may need community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation" (Safeguarding Vulnerable Groups Act 2006).

An 'Adult at Risk' may therefore be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment has learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to decide and needs care and support

4. Main Elements

The three main elements of the Policy are Prevention, Protection and Monitoring and Recording.

4.1 Prevention

4.1.2 The Group will put in place measures which are intended to prevent harm to children and adults at risk. The Group will:

- Raise awareness of issues relating to the welfare of young people and adults who are or may become vulnerable and promote a safe environment for these students including apprentices.
- Aid the early identification of young people and adults who are, or may become, vulnerable, who are at risk of significant harm.
- Adopt a zero-tolerance approach to bullying, discrimination, sexual harassment and sexual violence and recognise that even if there are no reported cases, staff must not take the view that it does not happen. All staff should challenge inappropriate behaviours between students that are abusive in nature.
- Staff will demonstrate professional curiosity and seek to identify concerns at the earliest opportunity.

4.1.3 Identifying Emerging Risks. The Group recognises that safeguarding risks evolve over time. Staff should remain alert to emerging safeguarding concerns including:

- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines
- Serious Youth Violence
- Online Harm
- Technology Facilitated Abuse
- Financial Exploitation
- Misogyny
- Harmful Online Content
- Mental Health Crisis
- Artificial Intelligence related safeguarding risks
- Radicalisation and Extremism

4.1.4 Safeguarding training and quality assurance arrangements will be regularly reviewed to ensure emerging risks are identified and responded to effectively.

4.1.5 Provide safeguarding and child protection training (including on-line safety) as part of the Group safeguarding approach and wider staff training and curriculum planning. Ensure training is

regularly updated including in-year updates to provide staff with the relevant skills and knowledge to safeguard children and vulnerable adults effectively. See section 10.

4.1.6 Ensure the Designated Safeguarding Lead and College Designated Safeguarding Lead and College Deputy Safeguarding Lead and Safeguarding Officers undergo appropriate training every two years and in addition to this training, their knowledge and skills will be refreshed at least annually.

4.1.7 Ensure the Designated Safeguarding Lead and Deputy Safeguarding Leads undertake Prevent awareness training to provide a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

4.1.8 Preventing extremism and radicalisation. As part of wider safeguarding responsibilities, college staff are alert to:

- Student groups who may be vulnerable to being drawn into committing terrorist-related activity.
- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parent/carer reports of changes in behaviour, friendship or actions and requests for assistance.
- Local authority services, and police reports of issues affecting students in other colleges or settings.
- Students voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths and cultures.
- Use of extremist or ''hate" terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Making remarks about being at extremist events or rallies outside college.

4.1.9 Establish and maintain a safe environment in which staff and students feel secure and are encouraged to talk freely about anything that concerns them.

4.1.10 Include opportunities in the Tutorial Programme and curriculum to promote British Values, reflect on appropriate behaviour e.g. consent and develop and equip students with the knowledge and skills needed to recognise risks and stay safe from abuse (including online).

4.1.11 Ensure that all adults within the College who have access to children, young people and vulnerable adults have been subject to appropriate checks using safer recruitment practices.

4.1.12 Maintain and review a single central record of Safer Recruitment and DBS checks and training and comply with the duty of employers to inform the DBS of any individual (paid employee, volunteer or other) who poses a threat to children or adults at risk.

4.1.13 Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection/ adult at risk matters including attendance at strategy meetings, case conferences, core group meetings and other relevant child or vulnerable adult protection meetings.

4.2 Protect

4.2.1 The Group will act and work in conjunction with other agencies, as appropriate, to protect children and adults at risk who may be at risk of harm or who have been harmed. This includes:

- Providing early intervention and support as soon as a problem emerges at any point in the young person or adult at risk's life. Work with other agencies to undertake Early Help Assessments, as required.

- Always acting in the best interest of the child/adult at risk and providing opportunities for students to be heard and understood in the implementation of any measures to protect them.

- Always considering whether children are at risk of abuse or exploitation in situations outside their families. Extras familial harms can 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 relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

- Being aware that harm can include ill treatment of others and that this can be particularly relevant, for example in relation to the impact on children on all forms of domestic abuse, including where they see, hear or experience its effects.

- Always alerting the College Designated Safeguarding Lead, Deputy Safeguarding Lead and or the Group Designated Safeguarding Lead urgently of concerns about female genital mutilation (FGM) and or where staff are concerned that a child may be at risk of Honour Based Abuse (HBA). (*There is a legal duty to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18*.).

- Responding immediately to concerns about and disclosures made by children and adults at risk which indicate that they may be at risk of harm or have been harmed.

4.2.2 If a student discloses that he or she has been abused in some way, the member of staff/volunteer should:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the student to talk freely
- reassure the student, but not make promises which might not be possible to keep
- never promise a student that they will not tell anyone
- reassure him or her that what has happened is not his or her fault

- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify what is being said
- not criticise the alleged perpetrator
- explain what must be done next and who must be told
- make a written record
- pass the information to the relevant Safeguarding Officer /DSL or Deputy without delay (if a Safeguarding Officer /DSL or Deputy is not available, staff must inform a senior member of staff or complete a child protection referral if this disclosure indicates that the student may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

Reporting Form: Link

Contact:

- Kingston College: mailto:Referral.team@stcg.ac.uk 0208 268 2969/2949
- Carshalton / Merton: ccstudent.support@stcg.ac.uk
- South Thames College: safeguarding.whs@stcg.ac.uk

4.2.3 Ensuring students know that they can approach their tutor or other members of staff if they are worried about anything, including issues related to sexual abuse, sexual harassment, radicalisation, extremism, domestic abuse, including exposure to domestic abuse and serious violence. The Group recognises that sometimes children / young people / Adults at Risk do 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 but that this should not prevent staff from having a professional curiosity and reporting any concern.

4.2.4 Ensuring all staff can reassure victims that they are being taken seriously and that they will be supported and kept safe.

4.2.5 The Group adopts a zero-tolerance approach to all forms of child-on-child abuse, including sexual violence, sexual harassment and harmful sexual behaviour. All allegations and concerns relating to child-on-child abuse will be managed in accordance with the Group's Child-on-Child Abuse, Sexual Violence and Sexual Harassment Procedure. The Group will ensure that victims are supported and kept safe and that risk assessments, safeguarding plans and any educational participation arrangements are informed by safeguarding considerations and the welfare needs of all students involved.

4.2.6 Ensuring staff follow accepted health and safety practices when working with students and that, where appropriate, risk assessments are carried out.

4.2.7 Helping students who are over 18 and not defined as adults at risk if they feel they are at risk of harm through creating an environment, where they are encouraged to talk to staff who can support them to talk to the police and/or other specialist services.

4.2.8 Acknowledging that a child that is looked after (CLA - Child that is Looked After) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have

the skills, knowledge and understanding to ensure that CLA and children who were previously looked after are kept safe. Our setting will ensure that all agencies will work together, and prompt action will be taken in response to any safeguarding concerns, especially for children, who are a particularly vulnerable group. Notable policy: STCG Inclusion and Outcomes for Care Experienced Students.

4.2.9 Acknowledging that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse.

4.2.10 Recognising that when a child has a social worker, it is an indicator that child is more at risk than most students. This may mean that they are more vulnerable to harm, as well as facing educational barriers to attendance, learning behaviour and poor health.

4.2.11 Ensuring that sanctions applied due to behaviour incidents involving children with special educational needs and disabilities (SEND), are appropriate and the additional vulnerability of the group is considered. See guidance: Reducing the Need for Restraint and Restrictive Intervention – June 2019

4.2.12 Early Help. The Group recognises that providing support as soon as the problem emerges can prevent concerns escalating.

4.2.13 Early help may include:

- pastoral intervention
- attendance support
- wellbeing support
- family support
- mental health intervention
- multi-agency support
- referral to specialist services

All staff should be alert to indicators that a student may benefit from Early Help and should discuss concerns with the Safeguarding Team.

4.2.14 Gender Questioning Children. The Group recognises that requests relating to social transition may require careful safeguarding consideration. Where a child requests changes relating to name, pronouns, presentation or other aspects of social transition, the Group will:

- act in the child's best interests
- consider safeguarding risks and vulnerabilities
- follow current Department for Education guidance
- involve parents/carers wherever appropriate and safe to do so
- undertake safeguarding or risk assessments where required
- maintain clear records of decisions made
- seek appropriate specialist advice where necessary

Any decisions will be made on an individual basis and will balance welfare, safeguarding, inclusion, privacy and legal considerations. Key Policy: Transgender and Non-Binary Policy and Procedures.

4.2.15 Ensuring appropriate response to any concern or allegation about a member of staff or volunteer including any low-level concerns as set out in the Group Policy for Low Level Safeguarding Concerns and the Procedure for Dealing with Allegations Link.

4.3 Monitoring and recording

4.3.1 The Group will ensure that all Safeguarding records are complete, timely and robust to ensure the early identification of students who need support and respond effectively to any concerns including the analysis of safeguarding concerns & trends at Group and college level.

4.3.2 Establishing procedures for reporting and dealing with allegations of abuse and exploitation.

4.3.3Ensuring the robust recording of safeguarding concerns and subsequent follow-up on CPOMS.

4.3.4 Ensure procedures for reporting and addressing support as soon as a problem emerges e.g. Early Help referrals.

4.3.5 Ensuring monitoring procedures which promote safer use of the internet and technology as per the Group's Online Safety Policy.

4.3.6 Ensuring the safe recruitment of staff and the maintenance of a single central record.

4.3.6 Ensuring that students at risk of being drawn into terrorism are identified and referred to the Prevent and Channel Co-ordinator for appropriate support.

4.4 Serious Incidents. Where safeguarding concerns meet the threshold of a Serious Incident, the Group may activate the Serious Incident Protocol alongside safeguarding procedures. Activation of the Serious Incident Protocol does not replace safeguarding responsibilities, and safeguarding processes will continue alongside any incident management arrangements.

5. Missing Education and Attendance

5.1 Children missing education remain a significant safeguarding indicator.

5.2 Persistent absence, repeated unauthorised absence, patterns of absence, unexplained withdrawal or disengagement may indicate:

- abuse
- neglect
- exploitation
- serious violence
- county lines activity
- mental health difficulties
- family difficulties

- radicalisation

Attendance concerns should therefore be considered within safeguarding processes and may require referral for Early Help or statutory intervention.

5.3 All students under 18 or who are an Adult at Risk who have unexplained persistent absences from college, or their whereabouts are unknown will be considered a safeguarding concern. If the student is deemed to be at immediate risk the safeguarding team at the College attended by the student concerned will undertake checks with the family/authorities to ensure the case has been reported to the Police. Any relevant information that might help to find or support the child will be shared. If the student is a Looked After Child, a Care Leaver or an Unaccompanied Young Person the college will immediately contact police and social services. If a child or Adult at Risk with a recorded safeguarding incident is absent from the college on repeated occasions the Safeguarding Team will undertake appropriate checks with the family/authorities. If any child or Adult at Risk is absent from the college on repeated occasions and there is a safeguarding concern it must be referred immediately to the nominated safeguarding officer by the teacher/tutor/member of staff. Similarly, if a student experiences multiple suspensions' or are at risk of permanent exclusion this should be reported as a safeguarding concern to the CDSL (College Designated Safeguarding Lead), Group DSL or Executive Principal (Skills and Inclusion) to ensure appropriate safeguarding checks take place and early help is requested from social services as appropriate.

Authorised absence and planned withdrawal.

5.4 If the Group becomes aware of a risk to a student's safety caused by factors such as actual or threats of violence and/or gang related activity which could also have implications for the safety of the student concerned and/or the wider student community a student safety risk assessment would be undertaken by the Group to identify the safety risks and any measures that could be put in place to mitigate the risk to a low level. The risk assessment would be developed following consultation with the student, parent/carer and relevant external agencies supporting the student.

5.5 After considering discussions with, and representations from, the student, relevant external agencies and parents, carer or Virtual School (as appropriate) the Group may decide to require the student to take an authorised absence which would usually be no longer than 5 working days to enable the risk assessment and associated measures to be undertaken and where possible put in place. Any decision to authorise an absence on this basis would be made by the relevant Executive Principal, following consultation with the relevant College Principal and the DSL (Director of Student Services) or in their absence the relevant College Designated Safeguarding Lead (Head of Student Services).

5.6 Subsequently, and normally no longer than 4 weeks, if any measures arising from the safety risk assessment cannot be achieved and/or put in place to reduce the risk the Group will withdraw the student from the college. Any decision for a planned withdrawal of the student would be considered by a Panel including the Group DSL and/or Executive Principal (Skills and Inclusion), a CDSL (College Designated Safeguarding Lead) and College Principal. The panel would consider the reasons for the withdrawal presented to it and any representations from the students, parents or carers and agencies

supporting the students prior to making its decision. Any appeal against the decision made by the panel would be made to the Executive Principal (Skills and Inclusion) within 5 working days and the appeal would be considered by a member of the Senior Leadership Team (SLT) not previously involved in a decision to withdraw the student concerned.

5.6 The DSL should record the number of students that have a safety risk assessment and should report to Senior Leadership Team via Safeguarding Review Group the termly position including those students that have been withdrawn or left the Group since the safety risk assessment.

6. Allegations or Low-level concerns about an adult working in the Group whether as a tutor, agency staff, support staff, other staff, volunteers or contractors.

6.1 At STCG we recognise the possibility that adults working in the Group may harm children and young people, including governors, volunteers, temp staff and contractors. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young person, parent or other adult within or outside of the organisation; or because of vetting checks undertaken.

6.2 Low-level safeguarding concerns

6.2.1 The term 'low-level' concern does not mean that it is insignificant. A low-level safeguarding concern is a concern raised, no matter how small, that an adult may have acted in a manner that appears to be below the 'harm' threshold that would lead to a formal safeguarding allegation but is inconsistent with the expected standards of behaviour, even if not linked to a particular act or omission, to create an unease as to the adult's behaviour particularly towards or around children. A 'low-level' concern is any concern that an adult working in or on behalf of the Group may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the relevant Designated Officer (formerly LADO).

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

- being over friendly with children, including being friends on social media
- having favourites
- taking photographs of children on their mobile phone, contrary to college policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or meeting a young person outside of the college setting for non-college reasons or
- humiliating children.

6.2.2 If any staff has any concerns about a member of staff or a volunteer staff, agency staff, contractors they must inform one of the following staff as soon as reasonably possible and, in any event, within 24 hours of becoming aware the concern if it relates to a particular incident:

- Relevant member of SLT:

- Executive Principal Skills and Inclusion
- Executive Principal Quality and Improvement
- Deputy Chief Executive (DCE)
- Executive Director Business Partnerships

- Group Designated Safeguarding Lead (DSL) – Director Student Services
- College Designated Safeguarding Lead (DCSL) – Head(s) of Student Services

6.2.3 If the low-level safeguarding concern has not been reported directly to one of the above, the recipient of the concern must inform the relevant member of SLT, Group DSL or College DSL as soon as possible and in any event within 24 hours of becoming aware of it.

6.2.4 Initially the relevant member of SLT, as the case manager, will determine, in consultation with the Group Designated Safeguarding Lead and Director of Human resources, that it is a low-level safeguarding concern and should not be reclassified as a safeguarding allegation which would meet the 'harm threshold'. The circumstances in which a low-level safeguarding concern might be reclassified as an allegation are where:

- The threshold is met for an allegation
- There is a pattern of low-level concerns which collectively amount to an allegation
- There is other information which when considered leads to an allegation
- It is a concern which involves a member of staff and a student or students

In any instance where there is uncertainty and or ambiguity regarding the classification of a low-level concern the case must be referred to the Staff Allegation Panel (6.3).

6.2.5 Having established that the safeguarding concern is low-level, the case manager will identify an appropriate member of staff to or nominated deputy collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

6.2.6 Records will be kept by HR and must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified.

The Low-Level Safeguarding Concerns Policy: Link.

6.3 Safeguarding Allegations

6.3.1 A safeguarding allegation is a claim that a staff member / volunteer / agency staff or contractors has committed a serious wrongdoing that does meet the 'harm threshold' such as physical, emotional, or sexual abuse which requires a formal investigation and notification of Designated Officer (Local Authority Designated Officer). This includes any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child/young person
- Possibly committed a criminal offence against/related to a child/young person
- Behaved towards a child or children/young person or people in a way which indicates she/he would pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college).

6.3.2 If a member of staff receives an allegation against another member of staff, or if they themselves believe a staff member has committed a serious wrongdoing, they must report the allegation immediately to a member of the Safeguarding Allegation Panel:

- Executive Principal Skills and Inclusion (EP)
- Director of Student Services (Group Designated Safeguarding Lead - DSL)
- Director of HR

6.3.3 Where one member of the panel is unavailable, the Head of HR and or relevant College Designated Safeguarding Lead (Head of Student Services) may be required to attend a panel meeting subject to availability.

6.3.4 All active cases (open to LADO / College Investigation) are reviewed weekly by the 'Staff Allegation Panel' to ensure safeguarding oversight and consistency of decision-making. The resultant 'Staff Allegation Central Tracking Record' is maintained by the Director of HR.

6.3.5 If the Designated Officer (LADO) determines that the safeguarding allegation meets the threshold for the Designated Officer process, the Designated Officer will, working with the Group, oversee the investigation to ensure it is fair, timely, and transparent, potentially involving the police or children's social care.

6.3.6 Where the Designated Officer determines that the allegation meets the threshold the members of the Panel and the Principal / CEO will be informed.

6.3.7 In the event of allegations against the Group Principal/CEO these should be reported to the Clerk to the Corporation who will plan for the allegations to be reported to the Chair of Governors. In the event of the need for the involvement of the Group Principal/CEO or the Chair of Governors, they will be required to undertake the actions defined for the case manager. If an allegation is made against a governor, the Group will follow the relevant local procedure. Where an allegation is substantiated, the procedures for removing the governor from office will be followed.

Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors: Link

7. Whistleblowing

7.1 As stated in KCSiE 2026, 'all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership team.'

7.2 If a member of staff, governor, volunteer or visitor has concerns about how a potential or actual safeguarding case is being managed, these should be raised with the Designated Safeguarding Lead in the first instance. If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

7.3 In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

7.4 Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: Multi-Agency Safeguarding Hub: 0300 126 7000, NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

General advice can be found at: www.gov.uk/whistleblowing
Whistleblowing Policy: Link

8. Safer Working Practice

8.1 To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document - Guidance for safer working practice for those working with children and young people in education settings (2022).

8.2 The document seeks to ensure that the responsibilities of college leaders towards young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the Staff Code of Conduct for more information.

8.3 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. The single central record must cover the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school and Governors.

8.4 Every job description, person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. In line with guidance included within Keeping Children Safe in Education 2026 and reflecting good safer recruitment practice the College will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.

8.5 The Group will ensure that at least one member of every interview panel has completed safer recruitment training within the last 3 years and that those members of staff who are safer recruitment trained refresh their knowledge every one to three years.

Safer Recruitment Policy: Link

9. Staff Induction, Training and Development

9.1 All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic safeguarding training on how to recognise signs of abuse, how to respond to any concerns, online safety (including their roles and responsibilities around filtering and monitoring systems) and familiarisation with the safeguarding policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges and other related policies.

9.2 There are mechanisms in place, such as safeguarding updates, to assist staff to understand and discharge their role and responsibilities as set out in part one of Keeping Children Safe in Education.

9.3 The training provided at induction will be proportionate to staff members' and governors' roles and responsibilities. The Group expectation is a member of staff cannot be deployed in their role until the necessary training has been completed.

9.4 The Group Designated Safeguarding Lead (DSL), College Designated Safeguarding Leads and the Deputy Safeguarding Leads at each college will complete the latest DSL safeguarding training every two years. In addition, the Group and College DSLs should undertake Prevent awareness training and disseminate an understanding of the Prevent Duty through the annual training programme delivered to staff each academic year. All safeguarding officers will receive dedicated and appropriate safeguarding training.

9.5 All staff members of the college receive appropriate training including a requirement to complete on-line CPD and attend relevant SG briefings / training during the academic year. The training will include the following aspects: Staff understand the difference between a safeguarding concern and a student in immediate danger or at risk of significant harm.

9.6 When concerned about the welfare of a student, staff should always act in the best interests of the young person. Staff know how best to respond to a student who makes a disclosure of abuse or harm and if unsure always refer it to the DSL/CDSL/DDSL /Safeguarding team. If staff have any concerns about a student's welfare, they should act on them immediately.

In addition, safeguarding training will enable staff to:

- recognise and respond appropriately to safeguarding concerns, including abuse, neglect, exploitation and extra-familial harm;
- understand their responsibilities under the Prevent Duty and identify indicators of radicalisation and extremism.
- identify and respond to child-on-child abuse, sexual violence, sexual harassment and harmful sexual behaviour, including incidents that occur online.

- understand the impact of domestic abuse, serious violence, criminal exploitation, county lines and other forms of harm on children and young people.
- recognise the role of technology in safeguarding and wellbeing, including online risks and emerging digital harms.
- identify students who may be vulnerable or at greater risk of harm, including those described in Section 3.
- understand that abuse, neglect and exploitation can occur both within and outside the family environment; and
- fulfil their statutory responsibilities in relation to Female Genital Mutilation (FGM), including the legal duty on teachers to report known cases of FGM involving a girl under the age of 18 to the police.

9.7 The nominated governor for safeguarding will undergo training prior to or soon after appointment to the role; this training will be updated every three years. All governors undergo specific awareness training to equip with them with the knowledge to provide strategic challenge, to ensure safeguarding policies/procedures are effective and deliver a robust whole-Group approach to safeguarding as set out in KCSiE 2026.

9.8 The Group will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the college.

10. Records and monitoring

10.1 The Group recognises its responsibility to keep accurate and up to date records of concerns and disclosures of abuse and the action taken to address these. The Group will ensure:

- All staff are aware of the need to report and record any concerns.

- All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing. If in doubt about recording requirements, staff should discuss with a Safeguarding Officer /or College Safeguarding Deputy or College Designated Safeguarding lead as appropriate.

10.2 All staff receiving a disclosure they should record it as follows:

- As soon as possible after the conversation using the relevant Safeguarding Reporting Form.
- Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the student.
- Record statements and observations rather than interpretations or assumptions.
- Do not destroy any original records in case they are needed by a court.
- All records need to be reported and logged on Group Safeguarding systems/files promptly. No copies should be retained by the member of staff or volunteer.

- The College DSL / Deputy will ensure that all safeguarding records are managed in accordance with the requirements set out in KCSIE 2026.

10.3 Safeguarding records are secure and separate from other student records.

10.4 If a young person for whom the Group has, or has had, safeguarding concerns moves to another education establishment where known, the safeguarding team will endeavour to pass their child protection file promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the safeguarding team will contact the DSL of the receiving school and offer information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

10.5 The safeguarding team will contact the previous education establishment if a safeguarding concern becomes known, and the college does not have a SG file from the previous provider.

10.6 Child Protection files are kept and transferred in line with requirements set out in KCSIE 2026.

11. Confidentiality and Information Sharing

11.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Where there is significant risk of harm (section 47) relevant information will be shared with or without the consent of the subject.

11.2 The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4).

11.3 When the safeguarding team is considering whether, or not, to share safeguarding information (especially with other agencies) STCG will record who they are sharing that information with and for what reason. If the Group have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within CPOMs.

11.4 All relevant information can be shared without consent if to gain consent would place a child at risk.

11.5 Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children/young people. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

11.6 Safeguarding young people raises issues of confidentiality that must be clearly understood by all staff/volunteers in colleges.

11.7 Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person's best interests.

11.8 Staff/volunteers who receive information about young people and their families in the course of their work should share that information only within appropriate professional contexts.

11.9 Timely information sharing is essential to effective safeguarding.

11.10 Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

11.11 Information Sharing Principles

Information sharing decisions should be:

- necessary;
- proportionate;
- relevant;
- accurate;
- timely; and
- secure.

11.12 Where safeguarding information is shared, the rationale for sharing, the lawful basis relied upon and any decision not to seek consent should be recorded within the Group safeguarding recording systems (CPOMS).

12. Communication with Parents/Carers

12.1 STCG will ensure the Safeguarding Policy is available publicly via the Group website.

12.2 Where appropriate, we will discuss any concerns about a child/young person with their parents. The safeguarding team will normally do this in the event of a suspicion or disclosure.

12.3 If the Group believes that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care before doing so.

12.4 In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

13. Contractors, Service and Activity Providers, Visitors

13.1 STCG will ensure the following:

- That contractors and providers are aware of our school's safeguarding policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns. The Safeguarding and External Contractors Procedure Link.

- Seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education.

- Check the identity of all visitors and volunteers coming into college. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the college site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

13.2 South Thames College values the opportunities presented by external speakers. The Group will not accept the behaviour of any individual, parent or anyone else, that threatens security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the college sites.

13.3. The Group will not accept the use of language by external speakers that offends and is intolerant. Specifically, this means 'street', misogynistic, sexual or racist language irrespective of context. Direct attacks in any religions or beliefs are not permitted. The Group will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people experience fear, harassment, intimidation or violence.

Key Policy: Freedom of Speech and Visiting Speaker Policy - Link

14. Work based learning (Apprenticeships)

14.1 All students on work-based learning programmes receive an induction, which includes raising awareness of the Group's commitment towards safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the safeguarding team.

14.2 The understanding of all aspects of safeguarding, preventing extremism and radicalisation and safe working practices is checked and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's wellbeing is safeguarded by work placement Assessors.

14.3 The Group has arrangements in place to ensure that, prior to work- based learning commencing:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details.
- Employers are made aware of relevant Group policies.
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

15. Work experience

15.1 All work placement providers will be given safeguarding information at the time of placement. The Group has arrangements in place to ensure that, prior to work experience:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details.
- Employers are made aware of relevant Group policies.
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

16. Organisations of Individuals Using College Premises

16.1 STCG will ensure that when our premises are used by organisations or individuals outside of the college day that all reasonable steps are taken, as required by law, to ensure the safety of the children and to protect them from harm. We will ensure that providers, their staff, and volunteers have a duty of care toward the children who attend. The guidance on Keeping children safe in out-of-school settings – April 2022 details the safeguarding arrangements that schools and colleges should expect these providers to have in place. Also refer to Guidance-for-parents-and-carers-on-safeguarding-children-in-out-of-school-settings/using-after-school-clubs-tuition-and-community-activities

16.2 We will follow our safeguarding policies and procedures, as with any safeguarding allegation, including informing the Designated Officer (LADO), if we receive an allegation relating to an incident that has happened when an individual or organisation has used our college premises for the purposes of running activities for children. This will cover any community group, sports associations, or service provider that runs extra-curricular activities on any of our college sites.

17. Online Safety

17.1 The Group recognises that online harms may significantly affect wellbeing, participation, attendance, safety and educational outcomes and will respond to online harms with the same level of seriousness as harms occurring offline.

17.2 The Director of Digital and IT acts as operational lead for filtering and monitoring arrangements and works with the Group DSL and the Lead Safeguarding Governor to undertake annual reviews of effectiveness.

17.3 Artificial Intelligence and Emerging Technologies. The Group recognises that artificial intelligence and emerging digital technologies may create additional safeguarding risks.

Potential risks may include:

- creation or distribution of inappropriate images
- deepfake imagery and videos
- cyberbullying
- harassment
- grooming
- radicalisation
- impersonation
- misinformation
- exploitation
- technology facilitated abuse

17.4 The Group will:

- review filtering and monitoring systems annually
- assess emerging technology risks

- provide staff training regarding AI related safeguarding concerns
- educate students regarding safe and responsible use of technology
- investigate concerns promptly and proportionately
- work with relevant agencies where criminal or safeguarding risks are identified

17.5 We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum, as part pf the Pastoral Programme and Be Safe events and information is also provided to parents/carers. When children / young people use the Group's network to access the internet, they are protected by accessing inappropriate content by a digital filtering system (FortiGuard Web Filtering) which flags students who are trying to access malicious, hacked or inappropriate websites.

17.6 The Group DSL reviews annually with the Director of Digital and IT and the Lead Governor the Groups filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content.

17.7 The system alerts the Group to inappropriate narrative or causes for concern which are typed in the browser. However, as many students can access the internet using their own data plan, to minimise inappropriate use, students receive tutorials on online safety.

17.8 All staff are made aware of the On-Line Safety, Digital Safeguarding and Appropriate Use Policy. The Policy sets out STCG expectations relating to:

- Creating a safer online environment – including training requirements, filters and monitoring.
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line.
- Inspiring safe and responsible use and behaviour.
- Safe use of mobile phones both within college and on college trips/outings.
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help.

17.9 All staff will receive on-line safety training as part of the ongoing safeguarding offer, which, amongst other things, will include an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. This training offer will be covered as part of induction. Alongside our Governing Body we will review the DfE Filtering and Monitoring Standards which can be found in the document Meeting Digital Technology Standards in Schools and Colleges (last update 2026) and discuss with IT staff and service providers what more needs to be done to meet all the standards in our setting. (See KCSIE 2026 for further information).

17.10 Staff must read the Staff Code of Conduct in relation to personal online behaviour and complete training in cyber security.

17.11 Filtering and Monitoring Governance. The Group will ensure that filtering and monitoring arrangements are effective, proportionate and reviewed regularly.

The Group Designated Safeguarding Lead, Director of Digital and IT and Lead Safeguarding Governor will jointly oversee filtering and monitoring arrangements and undertake at least annual review of:

- effectiveness;
- emerging risks;
- safeguarding trends;
- monitoring alerts;
- student vulnerabilities; and
- compliance with Department for Education Filtering and Monitoring Standards.

17.12 The Group will maintain documented filtering and monitoring arrangements which clearly define the responsibilities of safeguarding leaders, governors, staff and IT leaders in responding to safeguarding concerns identified through monitoring activity.

18. Child-on-Child Abuse, Sexual Violence and Sexual Harassment Procedure

18.1 The Group maintains a separate Child-on-Child Abuse, Sexual Violence and Sexual Harassment Procedure. All allegations involving child-on-child abuse will be managed in accordance with that procedure and the Safeguarding Children and Adults at Risk Policy.

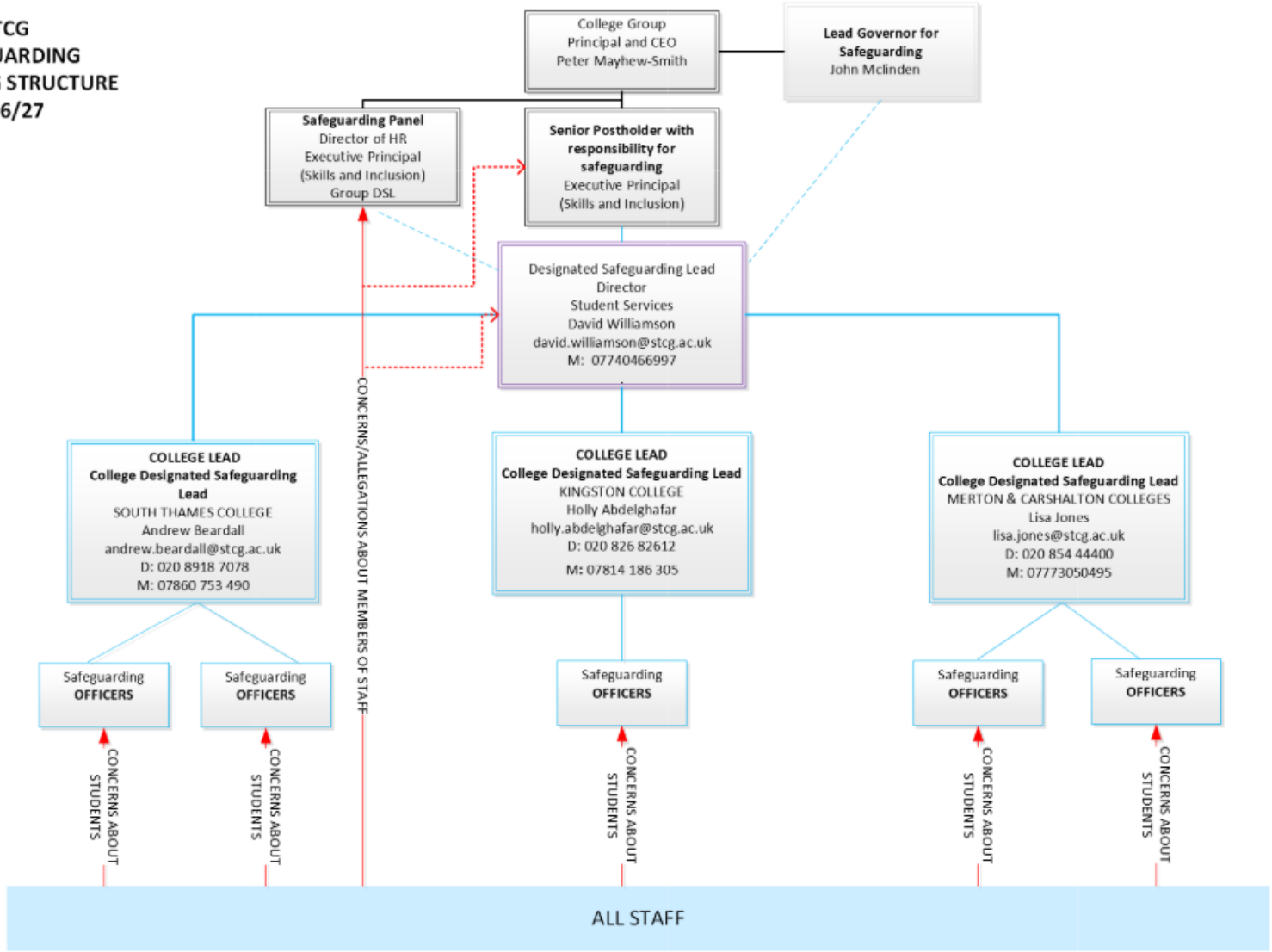
19. Review

19.1 The policy will be subject to, at least, an annual review and approval by Governors. The review will be initiated by the Designated Safeguarding Lead and will involve consultation with staff, managers, governors and students where appropriate.

20. Access to the policy

20.1 The policy is published on the Group website and on SharePoint (STCG's web-based collaboration and document management platform).

STCG SAFEGUARDING REPORTING STRUCTURE 2026/27



Appendix 1: KCSiE Part One: Safeguarding information for all staff

All staff at STCG are required to read Part 1 (in full). Link Here.

Appendix 2: Group Roles and Responsibilities

Safeguarding Accountability Framework

Safeguarding is everyone's responsibility. The Group will ensure that safeguarding is embedded within its culture, systems, curriculum, student support arrangements and quality improvement processes. Accountability operates through the following structure.

Role	Primary Accountability
Corporation	Strategic oversight, assurance and challenge
Group Principal and CEO	Overall accountability for safeguarding arrangements
Executive Principal (Skills and Inclusion)	Senior Postholder for Safeguarding
Group DSL (Director Student Services)	Strategic safeguarding leadership
College Designated Safeguarding Lead (Head of Student Services)	Operational safeguarding leadership within each college
College Designated Deputy Safeguarding Lead (DDSL) • Student Services Leader • Safeguarding Coordinator	College / School - Safeguarding case oversight, quality assurance and deputising for the CDSL
Safeguarding Officers	Case management, intervention and referral activity
College Principals	Safeguarding culture, inclusion and educational outcomes
Heads of School	Early identification, attendance, engagement and educational outcomes
Curriculum Manage, Academic Tutors, Pastoral Tutors.	Student welfare, professional curiosity and reporting of concerns
All Staff	Identification, recording and reporting of safeguarding concerns

Responsibilities of the Corporation (Governing Body)

The Corporation will:

- Ensure effective safeguarding arrangements are in place across the Group.
- Provide strategic challenge and oversight of safeguarding performance.
- Ensure compliance with statutory safeguarding legislation and guidance.
- Review safeguarding effectiveness through regular reporting and assurance activities.
- Ensure sufficient resources, staffing and training arrangements are in place.
- Appoint a Link Governor for Safeguarding.
- Promote a whole-Group safeguarding culture.

Responsibilities of the Group Principal and CEO

The Group Principal and CEO will:

- Hold overall accountability for safeguarding across the Group.
- Ensure appropriate governance, leadership and resources are in place.
- Ensure safeguarding concerns presenting significant risk are escalated appropriately.
- Support the development of a culture where safeguarding, inclusion and student wellbeing are organisational priorities.

Responsibilities of the Senior Postholder for Safeguarding (Executive Principal Skills and Inclusion)

The Senior Postholder will:

- Provide executive leadership for safeguarding.
- Ensure safeguarding arrangements remain effective, compliant and aligned to Group priorities.
- Promote the integration of safeguarding, inclusion, wellbeing and educational outcomes.
- Oversee safeguarding quality assurance and improvement activity.
- Monitor safeguarding performance and emerging risks.
- Line manage the Group Designated Safeguarding Lead.

Responsibilities of the Group Designated Safeguarding Lead (DSL)

The Group DSL has lead responsibility for safeguarding across the Group.

The Group DSL will:

- Provide strategic safeguarding leadership.
- Act as the principal safeguarding adviser to the Group.
- Ensure effective safeguarding policies, procedures and reporting arrangements are maintained.
- Ensure effective multi-agency working.
- Lead safeguarding quality assurance activity.
- Monitor safeguarding trends, emerging risks and vulnerable groups.
- Promote educational outcomes for children experiencing safeguarding concerns.
- Ensure staff receive appropriate safeguarding training and updates.
- Working with Director of HR on the arrangements relating to staff allegations and low-level concerns.
- Ensure effective oversight of child-on-child abuse, online safety, filtering and monitoring arrangements, allegations against staff and emerging safeguarding risks across the Group.
- Ensure effective Prevent and online safety arrangements are in place.

Responsibilities of the College Designated Safeguarding Lead (CDSL)

Safeguarding Lead has operational responsibility for safeguarding within their college.

The CDSL will:

- Lead safeguarding practice within the college.
- Provide safeguarding advice, support and challenge to staff.
- Oversee complex safeguarding cases and referrals.
- Ensure concerns are responded to promptly and effectively.
- Promote early intervention and multi-agency working.
- Ensure safeguarding records are accurate and compliant.
- Support educational outcomes for vulnerable learners.
- Work with college leaders to ensure safeguarding is embedded within the student experience.
- Promote a culture of professional curiosity, inclusion and student voice.

Responsibilities of the College Deputy Designated Safeguarding Lead (CDDSL)

The College Deputy Centre Safeguarding Lead supports the College Designated Safeguarding Lead operational leadership of safeguarding within their college. The CDDSL are usually Student Services Team leaders and Safeguarding Coordinators.

The CDDSL Safeguarding Lead will:

- Act as a key safeguarding contact for staff, students and external agencies.
- Provide safeguarding advice and guidance to Safeguarding Officers and staff.
- Support the management of safeguarding referrals, interventions and safety planning.
- Manage and coordinate complex safeguarding cases.
- Support quality assurance, case audits and CPOMS compliance.
- Liaise with external safeguarding partners and multi-agency services.
- Promote safeguarding awareness and staff development.
- Deputise for the College Designated Safeguarding Lead where required.

Responsibilities of College Principals

College Principals will:

- Promote a safe, inclusive and trauma-informed college culture.
- Ensure safeguarding arrangements are effectively implemented.
- Work with safeguarding teams to support vulnerable learners.
- Monitor safeguarding, attendance, engagement and educational outcomes.
- Ensure safeguarding is embedded within curriculum delivery and student experience.
- Promote student voice, belonging and wellbeing.
- Support a culture of early intervention and prevention.

Responsibilities of Heads of School

Heads of School will:

- Support the early identification of learners who may be vulnerable or at risk.
- Monitor attendance, engagement, achievement and participation.
- Remove barriers to learning and progression.
- Ensure safeguarding concerns are reported promptly.
- Promote relational, inclusive and trauma-informed practice.
- Work closely with Student Services and safeguarding teams.
- Ensure students know where and how to access support.

Responsibilities of Safeguarding Officers

Safeguarding Officers will:

- Receive, assess and manage safeguarding concerns.
- Maintain accurate safeguarding records.
- Coordinate referrals and interventions.
- Liaise with internal and external professionals.
- Support students affected by safeguarding concerns.
- Promote safeguarding awareness within curriculum areas.
- Escalate concerns where appropriate.
- Contribute to safeguarding quality assurance activity.

Responsibilities of All Staff

All staff will:

- Put the welfare of children and adults at risk first.
- Maintain an attitude that "it could happen here".
- Undertake safeguarding training and updates.
- Demonstrate professional curiosity.
- Recognise that behaviour may indicate unmet need, trauma, abuse or exploitation.
- Create safe, respectful and inclusive learning environments.
- Identify and report safeguarding concerns promptly.
- Record concerns accurately.
- Support students to access help and support.
- Promote student safety, wellbeing, inclusion and positive outcomes.

Appendix 3: Actions where there are concerns about an Adult at Risk

Safeguarding will apply to any adult who:

- Has needs for care and support (whether the authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect, and;
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Abuse: Abuse is a form of maltreatment of a person. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm.

In deciding whether to refer or not, the College Designated Safeguarding Lead or College Deputy Designated Safeguarding Lead should consider:

- the adult's wishes and preferred outcome
- whether the adult has mental capacity to make an informed decision about their own and others' safety
- the safety or wellbeing of children or other adults with care and support needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- the police if a crime has been committed and/or
- the Adult Safeguarding Team for possible safeguarding enquiry
- relevant regulatory bodies such as Care Quality Commission, Ofsted, Charities commission
- service commissioning teams
- family/relatives as appropriate (seek advice from adult social services)

A record of the reasons for referring the concern or reasons for not referring must be kept. Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and volunteers should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

The designated safeguarding lead or centre safeguarding lead is responsible for providing acknowledgement of the referral and brief feedback to the person raising the original concern. Feedback should be given in a way that will not make the situation worse or breach the Data Protection Act. If the police are involved, they should be consulted prior to giving feedback to the referrer to ensure any criminal investigation is not affected.

The local authority will decide on who will lead on a safeguarding enquiry should it progress to that stage. The named organisation should not conduct its own safeguarding enquiry unless instructed to do so by the local authority.

Appendix 4: Operational Flowcharts

1. Reporting a Safeguarding Concern

Staff Concern → Safeguarding Reporting Form → Safeguarding Officer → College Deputy Safeguarding Lead → College DSL → Referral/Early Help

2. Responding to an immediate safeguarding danger

Staff concern that student is in danger → Duty Manager /Principal → Police / Emergency Services → College DSL / DDSL → CPOMS record → Multi-Agency Referral → College Case Review.

3. Prevent Referral Process

Staff Concern → Safeguarding Team → CPOMS → Prevent Assessment CDSL/College DDSL → Channel Referral → Notify Group DSL

4. Staff Allegation Process

Staff concern → Staff Allegation Panel → LADO Consideration → Investigation → Outcome