LONDON SOUTH EAST COLLEGES
BROMLEY | BEXLEY
GREENWICH | ORPINGTON

SAFEGUARDING POLICY 2026/27 (incorporating Child Protection and Adults at Risk Procedures)

Responsible post holder	Group Executive Director Safeguarding, Wellbeing and Inclusion
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- This policy is available online at www.lsec.ac.uk
- We will consider any request for this policy to be made available in an alternative format or language. To make a request, contact: safestudent@lsec.ac.uk
- We review our policies regularly to update them and to ensure that they are accessible and fair to all. We welcome suggestions for improving the accessibility or fairness of this policy.

All our policies are subject to equality impact assessments. We are always keen to hear from anyone who wishes to contribute to these impact assessments. To do so, please contact: safestudent@lsec.ac.uk

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LOCAL SAFEGUARDING CHILDREN PARTNERSHIPS/BOARDS AND LOCAL AUTHORITY DESIGNATED OFFICERS: The LSCP and/or LADO should be contacted for advice or to report an allegation against a member of staff. This would generally be by a College DSL, but all staff have the right to raise concerns directly with the LADO, especially regarding possible failings in the College's safeguarding procedures, but only after internal whistleblowing processes have been followed.	
Bexley	Local Authority Designated Officer (LADO) - managing allegations of abuse made against somebody who works with children in Bexley | Bexley Safeguarding Partnership
Bromley	Bromley LSCB - Managing allegations made against adults
Greenwich	Report your concerns about a child | Royal Borough of Greenwich
Lambeth	Allegations Against Staff, Volunteers and Foster Carers - Lambeth Safeguarding Children Partnership
PREVENT	
National Prevent referral form National Police Prevent Advice Line 0800 011 3764	

LOCAL MULTI-AGENCY SAFEGUARDING HUBS (MASH): To be contacted for advice and when making referrals to Social Care	
Bexley	Worried about a child | London Borough of Bexley
Bromley	Bromley Children and Families Hub
Greenwich	Report your concerns about a child | Royal Borough of Greenwich
Lambeth	Report concerns about a child | Lambeth Council

1. Introduction, Statement of Intent and Purpose

1.1 Introduction

London South East Colleges has a statutory and moral duty to ensure that it safeguards and promotes the welfare of those receiving education and training at the College.

Throughout this policy and associated procedures, references to "children and young people" or "child protection" mean those under the age of 18, including unborn children. The College recognises that safeguarding duties also apply to adults at risk and that adult safeguarding concerns must be responded to in line with the Care Act 2014, UK GDPR, local adult safeguarding arrangements and College procedures. An adult at risk is a person aged 18 or over who has needs for care and support, whether or not those needs are being met, is experiencing or is at risk of abuse or neglect, and, as a result of those care and support needs, is unable to protect themselves from the risk or experience of abuse or neglect. The term "adult at risk" should be used in preference to "vulnerable adult", except where quoting legislation or historic guidance.

1.2 Statement of Intent

The Governing Body is committed to ensuring that the College:

- provides a safe and secure environment in which children, young people and adults are able to learn.
- explores safeguarding issues within the curriculum, induction, tutorial programme and enrichment activities.
- creates and maintains a culture where students, staff, volunteers and visitors are able to raise concerns and are listened to.
- ensures that everyone is aware of their role and responsibilities with respect to safeguarding and follows the necessary process and procedure to protect young people and promote their welfare.
- identifies children and young people who may benefit from Early Help and those who are suffering, or likely to suffer, significant harm, and
- takes appropriate action to ensure that such children, young people and adults are kept safe, both at home, at the College and online in so far as this is possible and in partnership with local authority children and adult services and local police.
- provides a safe environment, prevention, response and support to ensure that students have:
    - the right to freedom from inhumane and degrading treatment
    - the right to respect private and family life including to protect individuals' physical and psychological integrity.
    - the right to access education without discrimination.
    - promotes an inclusive, anti-discriminatory safeguarding culture in which racism, faith-based prejudice, faith-targeted abuse and all forms of discrimination are recognised, challenged and addressed as potential safeguarding harms. The College will seek to create an environment where students, apprentices and adults at risk feel safe, respected, listened to and able to report concerns.

1.3 Purpose

In pursuit of these aims, the Governing Body will approve and annually review policies and procedures with the purpose of:

- raising awareness of issues relating to the welfare of children, young people and adults and the promotion of a safe environment for children, young people and adults learning within the College
- highlighting specific safeguarding concerns
- aiding the identification of children and young people at risk of significant harm, and providing

clear procedures for reporting concerns
- establishing procedures for reporting and dealing with allegations of abuse against members of staff
- ensuring the safer recruitment of staff

2 Scope

2.1 The terms and requirements of this policy apply to:
- all directly enrolled students and apprentices, irrespective of age, the course(s) being studied or the location at which the programme is being delivered (at a college campus, on an employer's premises etc.)
- other people (non-students) if the College receives information which means they are at risk of harm.
- all staff employed by the College, irrespective of role, contractors and their staff, governors, volunteers and visitors to college campuses.
- all learning environments and activities arranged by or on behalf of the College, including campuses, subcontracted and alternative provision, apprenticeships, employer premises, work placements, enrichment, sport, off-site activity, trips, residential or overnight activity, remote learning, online platforms and external organisations using College premises.

3. Relevant Legislation and Guidance

3.1 In developing this policy and associated procedures, the Governing Body will take account of statutory and advisory guidance issued for England by the Department for Education, Home Office and other relevant bodies, together with the London Safeguarding Children Procedures and local safeguarding partnership arrangements. This policy has been reviewed against Keeping Children Safe in Education 2026, Working Together to Safeguard Children, the Prevent duty guidance for England and Wales, Information Sharing advice for safeguarding practitioners and the London Safeguarding Children Procedures and Practice Guidance.

3.2 The College recognises its duties under relevant legislation and guidance, as follows:

Legislation
- Children Act 1989 (and 2004 amendment)
- Education Act 2002
- Section 5B of the FGM Act 2003 as inserted by section 74 of the Serious Crime Act 2015
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Adoption and Children Act 2002
- Children and Young Persons Act 2008
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Human Rights Act 1998
- Data Protection Act 2018
- Care Act 2014
- Equality Act 2010
- Public Sector Equality Duty under the Equality Act 2010
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Terrorism Protection of Premises Act 2025, where relevant to premises, events and publicly accessible locations

Guidance

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children, as amended and in force at the time of policy approval
- Information sharing to safeguard children and young people: statutory guidance for safeguarding organisations and practitioners, Department for Education, September 2026
- Local multi-agency safeguarding information sharing protocols and data sharing agreements, including strategic and operational agreements adapted from Department for Education templates where used by safeguarding partners
- London Safeguarding Children Procedures and Practice Guidance, including updates issued in 2026
- Prevent duty guidance for England and Wales 2023, updated 2024
- Channel and Prevent Multi-Agency Panel guidance
- SEND Code of Practice: 0 to 25 years
- Supporting pupils at school with medical conditions, adapted as appropriate for college provision
- Meeting Digital and Technology Standards in Schools and Colleges, including filtering and monitoring standards
- Statutory guidance and local safeguarding arrangements for Further Education, apprenticeships, work-based learning, adults at risk, Prevent and multi-agency safeguarding partnerships

3.2.1 The Education Act 2002 requires Governing Bodies of Further Education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

3.2.2 The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children. Although social care services and the police are responsible for investigating child abuse and neglect, all those who come into contact with children and young people have a duty to promote and safeguard them.

3.2.3 Under the Counter-Terrorism and Security Act 2015, the College is required to have “due regard to the need to prevent people from being drawn into terrorism, violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.”

3.2.4 The College will refer concerns that a child or young person might be at risk of significant harm to the appropriate agencies as agreed with the Local Safeguarding Children Partnerships (LSCP) for the areas in which its students live.

3.2.5 The College works closely with its partner agencies across Bromley, Greenwich, Bexley and Lambeth, and beyond, reflecting the College’s catchment area. These include the local authorities, police, Local Safeguarding Children Partnership, Channel Police Practitioner (CPP) and the local Prevent Coordinators to ensure information is shared, and referrals are made as appropriate.

3.3 All staff will receive safeguarding and child protection training, including online safety, filtering and monitoring, Prevent, child-on-child abuse, low-level concerns, information sharing, safeguarding records, attendance as a safeguarding indicator and routes for escalation. Training will take place at induction and be refreshed at least annually, with regular safeguarding updates provided throughout the year. The DSL and Deputy DSLs will receive training to the standard required by statutory guidance and local safeguarding partnership arrangements.

The Governing Body will receive from the Group Executive Director Safeguarding, Wellbeing and Inclusion an annual report which reviews how safeguarding duties have been discharged. This report will include a data summary, emerging themes, staff training and assurance, online safety, filtering and monitoring, AI-related safeguarding risks, child-on-child abuse, low-level concerns, allegations management, safer recruitment, support for students requiring mental health support, young carers, children questioning their gender where relevant, and examples of good practice. The nominated safeguarding governor will sit on the Safeguarding Strategy Group.

The policy should be read in conjunction with:

- Preventing Extremism and Radicalisation Policy
- Online Safety and Acceptable Use Policy
- Sexual Harassment and Violence Policy
- Attendance Procedures
- Staff Code of Conduct
- Safer Recruitment Policy and Single Central Record procedures

Note: References to students made in the policy incorporate processes for Apprentices.

4. Key definitions and concepts

All staff must recognise that harm is not limited to physical abuse, neglect or sexual abuse. Prejudice-based harm, including racism, faith-based prejudice, faith-targeted abuse and other forms of discrimination, can cause significant harm to a child or young person's welfare, wellbeing, mental health, identity, sense of safety, attendance, engagement and willingness to seek help. Such concerns must be taken seriously, recorded and shared with the safeguarding team where there is any indication of risk, cumulative harm or wider safeguarding concern.

4.1 **In Keeping Children Safe in Education 2026**, safeguarding and promoting the welfare of children is defined 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

Safeguarding and promoting the welfare of children is a broader term than child protection, which refers to the process of protecting children identified as either suffering, or likely to suffer, significant harm because of abuse or neglect. It also involves measures and structures designed to prevent and respond to abuse and neglect.

4.2 **Keeping Children Safe in Education 2026** also sets out definitions of the four broad categories of abuse. These broad categories are a useful guide for staff who have responsibility for children and young people. The categories of abuse are listed below together with possible signs and symptoms of abuse. The signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list and many of the signs and symptoms could fall into more than one category. Also, students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for physical activities, constant tiredness) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that young people with a disability are 3 times more likely to experience abuse or neglect than non-disabled peers.

5. Roles and Responsibilities

5.1 The College has a clear structure of staff and support for safeguarding across the College. The roles and responsibilities of those staff with designated safeguarding responsibilities are defined in this policy. These staff will be provided with the resources and time required to fulfil the requirements of that role. However, it is also recognised that safeguarding is "everyone's responsibility" and that all have a role to play in keeping children and young people safe.

5.2 Designated Safeguarding Lead (DSL)

The senior member of staff with lead responsibility for safeguarding (Designated Safeguarding Lead) is Sandra Chick, Head of Safeguarding and Wellbeing.

This person is a member of the College Management Team and reports to the Deputy Principal Learner Life, SEND and Stronger Communities. The DSL has a key duty to take lead responsibility for raising awareness among the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College.

Nido Volans Lambeth has a dedicated DSL, Perry Vlachos, who is responsible for the safeguarding practices at the campus. The DSL for Nido Volans Lambeth will work with the College DSL to ensure that practices are standardised across all campuses.

Keeping Children Safe in Education 2026 details the key responsibilities of the DSL.
The DSL will take lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring arrangements. The DSL will oversee referrals to children's social care, adult social care, the police, Channel, LADO and other agencies as appropriate; work with staff, senior leaders, governors, parents, carers, employers, subcontractors and safeguarding partners; maintain accurate safeguarding records; ensure timely transfer of safeguarding files; support staff to identify and respond to concerns; promote effective information sharing; understand and respond to the views, wishes and lived experience of children and adults at risk; contribute to staff training and curriculum safeguarding; and escalate concerns where a child, young person or adult at risk is not receiving the help or protection they need.

5.3 Deputy Designated Safeguarding Leads (DDSL)

The Deputy Designated Safeguarding Leads are the:

- Senior Safeguarding Officers
- Designated Teacher for Looked After Children
- Deputy Principal Learner Life, SEND and Stronger Communities

Keeping Children Safe in Education 2026 details the key responsibilities of the DDSL.
Deputy DSLs will be trained to the same standard as the DSL, will provide effective cover during term time and College opening hours, and will act with the authority required to manage referrals, make safeguarding decisions and support staff when the DSL is unavailable.

5.4 The Governing Body

The governing body is responsible for ensuring that the College complies with its duties under the legislation.
The Governing Body will ensure there is effective oversight and assurance that all staff have read and understood Part One of Keeping Children Safe in Education 2026, including staff who do not work directly with children. The Governing Body will also ensure that safeguarding training, safer recruitment, low-level concerns, allegations management, online safety, filtering and monitoring, AI-related safeguarding risks, child-on-child abuse, safeguarding file transfer

and information-sharing arrangements are reviewed and reported through the College's safeguarding governance cycle.

Keeping Children Safe in Education 2026 details the key responsibilities of the governors.

5.5 Designated Governor

The designated governor, Darren Kirwin, is responsible for liaising with the Deputy CEO and Principal, Deputy Principal Learner Life, SEND and Stronger Communities, Group Executive Director Safeguarding, Wellbeing and Inclusion and Designated Safeguarding Lead over matters regarding child protection, including:

- ensuring that the College has policies and procedures which are consistent with the LSCP's procedures.
- ensuring the Governing Body considers the College policy on child protection and safeguarding adults at risk each year.
- ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

To assist in these duties, the designated governor shall receive appropriate training.

Where a member of the Governing Body has a safeguarding concern or has been informed of a safeguarding concern, they should make initial contact with the Governance Professional, Jennifer Pharo, to the Corporation. The Governance Professional is a central contact for all Governors and is best placed to then make contact with the Safeguarding Leadership within the College.

5.6 College Safeguarding Officers

In addition to the DSL and DDSLs, the College trains a number of staff, including those with pastoral responsibilities, to be a first point of contact for students and/or staff who have concerns about safeguarding. The HR department holds records of all staff who are trained. These Safeguarding Officers receive training in child protection issues and inter-agency working, as required by the LSCP, and receive refresher training at least every 2 years. They will report to the designated staff members (for safeguarding issues only) and will:

- be available to provide advice and support to other staff on issues relating to child protection.
- be available to listen to students studying at the College.
- lead on individual cases, including liaising with parents/carers and, where appropriate, social workers and others to safeguard young people.
- maintain proper records of any child protection referral, complaint or concern (even where that concern does not lead to a referral), ensuring that all details are recorded on the safeguarding system.
- support the provision of information to parents of children and young people within the College to promote awareness of the College's Safeguarding Policy.

5.7 Subcontracted Provision and Work Experience

5.7.1 Subcontracted providers are required to have their own safeguarding policy and associated procedures, and make this available, or to adopt the LSEC Safeguarding Policy and Procedures. Providers are required to have their own DSL (and one deputy as a minimum). Learners are advised through their induction about keeping themselves safe and who to raise a safeguarding concern with.

5.7.2 All subcontracted staff should go through full pre-employment checks including DBS

numbers/dates and undertake safeguarding and Prevent training which should be refreshed annually. Sub-contractor staff information should be recorded on a Single Central Record maintained by the provider and available for inspection by LSEC. The identity of sub-contractors and their staff will always be checked on arrival at the College.

5.7.3 Subcontracted providers, alternative provision partners and work placement employers must provide safeguarding assurance proportionate to the nature of the provision. This includes confirmation of safeguarding and child protection policies, named DSL and deputy arrangements, safer recruitment evidence, Single Central Record arrangements where applicable, attendance and absence monitoring, escalation routes, information-sharing protocols, Prevent training and clear arrangements for reporting concerns to the College safeguarding team.

Subcontractor safeguarding records should be maintained and stored in accordance with UK GDPR, data protection requirements and safeguarding record-keeping expectations. Records must be available for review by the College where required for safeguarding assurance, audit or investigation.

5.8 Contractors/Consultants/Volunteers and Others Working at College Campuses

Non-employees undertaking work at College campuses must comply with the College's Health and Safety and safeguarding requirements. This will depend on the nature, location and duration of the work but may involve confirmation of a DBS check and other pre-employment checks, a risk assessment process, a briefing on the first day of work, inclusion in contractual terms, and participation in relevant training. All non-employees who will be unaccompanied on campus must be known and approved by HR and recorded on the Single Central Record prior to being authorised to start working on campus.

5.9 Visitors to College campus

5.9.1 All visitors are required to sign in at Reception on arrival and are to be collected by the person they have arrived to see.

5.9.2 A separate statement, Code of Practice on Freedom of Speech and Expression and Visiting Speaker and Fund-Raising Guidance, covers the risk assessment of visiting speakers and other visitors to College campuses.

5.9.3 Similarly, protocols are in place for advising hirers of the College's facilities of their safeguarding responsibilities.

5.9.4 Where external organisations use College premises, they must comply with College safeguarding expectations. This includes appropriate risk assessment, supervision arrangements, safeguarding policies and procedures, reporting routes, safer recruitment checks where relevant, and confirmation that concerns will be reported promptly to the College. The College may refuse or terminate use of premises where safeguarding requirements are not met.

5.10 Bringing Children onto College Premises for Childcare

Staff must not bring children onto College premises for childcare during working hours, except in strictly limited and exceptional circumstances. As a professional educational institution, the College must maintain a safe, focused and disruption-free environment for students, apprentices, staff and visitors, and must ensure that workplace health and safety, safeguarding and teaching and learning standards are not compromised.

Short-term temporary access may be considered only where there is a sudden, unforeseeable and unavoidable childcare emergency. This may include same-day unannounced closure of a school, nursery or childcare provider, or a sudden medical emergency affecting the child's primary caregiver. Planned childcare gaps, routine childcare difficulties, school holidays, inset days or convenience arrangements will not normally be treated as exceptional circumstances.

Where an exceptional childcare emergency arises, the member of staff must obtain explicit written approval from their line manager before arriving on campus with the child. The line manager must consider the nature of the emergency, the role being undertaken, the proposed location, the duration of the visit, any safeguarding or health and safety risks, and whether the presence of the child could affect the quality, continuity or safe delivery of teaching, learning, support services or student-facing activity.

If temporary access is approved, the child must remain in an agreed low-risk administrative area and must not enter high-risk or learner-facing areas, including workshops, kitchens, salons, construction areas, sports facilities, teaching rooms, learning resource centres, student communal areas or any other area identified through risk assessment. The child must not access College systems, equipment or confidential information.

The member of staff remains responsible for supervising the child at all times. Children must never be left unattended, must not be placed under the supervision of another member of staff, student, apprentice, contractor or visitor, and must not be permitted to move around the campus independently.

Where a childcare emergency cannot be managed safely or without disruption on College premises, line managers should consider alternative support arrangements. These may include immediate remote working where the role permits, emergency leave for dependants, temporary flexible working arrangements or other appropriate management support in line with HR procedures.

Unauthorised breaches of this requirement, or failure to comply with agreed controls, will be treated seriously and managed through normal line management, HR, safeguarding or disciplinary procedures as appropriate.

5.11 Students and Apprentices

Students and Apprentices are responsible for complying with all College policies and procedures that are designed to keep the College a safe and secure place in which to learn. They will receive information on policies, procedures and the College's safeguarding arrangements during their induction and should raise any concern they have about the safety of themselves or others immediately.

5.12 Parents/Carers

The College recognises the contribution that parents and carers can make in keeping children and young people safe. Parents/carers will be made aware of the College's Safeguarding Policy – which is publicly available on the College's website. Parents and carers will be encouraged to participate in information/parents' evenings and in discussions involving the safeguarding and well-being of their children (unless this is deemed not to be in the best interests of the child).

5.13 External Supervisor

The College engages an external supervisor to support the work of the central safeguarding team. The supervisor meets the team twice termly to discuss challenging cases, provide guidance and

support, act as a critical friend and help the team continue to develop reflective, professional safeguarding practice.

6. Learner-Centred and Co-ordinated Approach to Safeguarding

6.1 Safeguarding is everyone's responsibility

In line with KCSIE 2026, the College supports the view that safeguarding is everyone's responsibility. All members of the College community, including staff, governors, students, apprentices and contract staff, are responsible for safeguarding and promoting the welfare of children and adults at risk, and must always consider what is in their best interests. No single professional can have a full picture of a child's needs and circumstances; therefore, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and acting promptly.

6.2 Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between students outside of these environments. All staff, but especially the designated safeguarding lead (and deputies), should consider whether children are at risk of abuse or exploitation 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 exploitation, criminal exploitation, and serious youth violence.

6.3 Students with particular vulnerabilities

The College recognises that the circumstances of specific categories of students render them particularly vulnerable to certain types of abuse. Safeguarding procedures are customised in these instances to address these vulnerabilities and specialist safeguarding officers have been identified to offer support in these areas of provision. These categories include:

- Students with Special Educational Needs and Disabilities (SEND)
- Looked After Children (LACs) / Young Care Leavers (YCLs)
- Students who are privately fostered
- Students on English for Speakers of Other Languages (ESOL) courses
- Students whose programmes include Work Based Learning (WBL), including apprentices
- Adults at risk

Children and adults with Special Educational Needs and Disabilities are subject to additional safeguarding challenges as they may have difficulties with communication, are at higher risk of peer group isolation and may be disproportionately affected by bullying. College staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

The College recognises that young carers may need additional support and may be at increased risk of absence, stress, poor wellbeing, reduced engagement or hidden caring responsibilities. Staff should remain alert to signs that a student may be a young carer and should share concerns with the safeguarding team so that appropriate support, information sharing and referral pathways can be considered.

Where a young person or adult at risk appears to require mental health support, staff must consider whether this may also indicate abuse, neglect, exploitation or other safeguarding risk. Mental health concerns should be recorded, shared and escalated where safeguarding concerns are present, while recognising that staff are not expected to diagnose mental health conditions.

6.4 Early Help

6.4.1 In line with KCSIE 2026, the College supports the view that providing early help is more effective in promoting the welfare of children than reacting to incidents as they occur. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Staff must understand the distinction between college-led pastoral or early support and local authority-led Family Help or statutory children's social care processes, and must seek advice from the safeguarding team where thresholds are unclear.

Staff should understand local Family Help arrangements, including local thresholds, referral pathways and the distinction between College-led pastoral support, targeted Family Help and statutory children's social care intervention. Where staff are unsure about the most appropriate pathway, they should seek advice from the safeguarding team without delay.

6.4.2 Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focus on activity to significantly improve the outcomes for the child. Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children and it is stated that colleges are an important partner for the local authorities in which they operate.

6.4.3 College staff are particularly well placed to be alert to the potential need for early help, Family Help or statutory safeguarding support for a child or young person. Any child may benefit from early help, but staff should be particularly alert to the potential need for support where a young person.

Staff should use professional curiosity, consider the whole context of a student's life and avoid assumptions based on protected characteristics, family background, attendance, behaviour, SEND, mental health, care experience or previous safeguarding history. Where concerns are emerging but do not yet meet statutory thresholds, staff should still record and share information promptly so that patterns, cumulative harm and changes in risk can be identified early:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has persistent, unexplained or concerning absence, a sudden change in attendance patterns, or is at risk of becoming missing from education, including where this may indicate exploitation, neglect, mental health difficulties, domestic abuse, family stressors or other safeguarding concerns.
- Has experienced multiple suspensions, is at risk of permanent exclusion from college or their previous school, is in Alternative Provision or a Pupil Referral Unit, or is at risk of modern slavery, trafficking, sexual exploitation, criminal exploitation, radicalisation or other forms of coercion or exploitation.
- Has a parent or carer in custody or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves.

- Is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

Students who are lesbian, gay, bisexual or questioning their sexual orientation are not inherently at risk because of this. However, they may be targeted by others, experience prejudice-based or discriminatory abuse, or be more vulnerable where they do not have a trusted adult or key worker with whom they can speak openly. The College will provide safe, respectful and inclusive spaces for students to raise concerns and access support, while ensuring that safeguarding decisions are child-centred, evidence-informed, proportionate, recorded, and consistent with statutory guidance, equality duties and local safeguarding procedures.

Where a student is questioning their gender, staff must respond with sensitivity, avoid making promises of confidentiality and seek advice from the safeguarding team. For students under 18, parents or carers should usually be involved unless doing so would create a risk of significant harm or otherwise compromise the student’s safety or welfare. Any decision not to contact parents or carers must be approved by the DSL or Deputy DSL, clearly recorded with the rationale, and kept under review. Decisions should be informed by the student’s wishes and feelings, safeguarding risk, equality duties, relevant clinical or professional advice where available, and the current status of Department for Education guidance.

The College will not initiate any action relating to social transition. Where a student or their parent/carer requests support relating to social transition, staff must refer the matter to the safeguarding team so that any response is considered on a case-by-case basis, documented and kept under review. The College will take time to understand the student’s thoughts, feelings and wider circumstances, remain professionally curious about possible mental health, psychosocial, family, peer or bullying-related vulnerabilities, and ensure that any support is proportionate, safeguarding-led and consistent with equality and human rights duties. College policies and practice should avoid rigid gender stereotypes and maintain flexibility across College life, while ensuring that bullying, prejudice and discrimination are challenged promptly.

Staff working with apprentices have a duty of care to ensure that apprentices are safe in their work placement and that employers know how to raise safeguarding and wellbeing concerns. Particular attention must be given to apprentice attendance, engagement and welfare because apprentices may interact with College staff less frequently. Responsible staff must ensure there is regular contact, prompt follow-up of absence or disengagement and clear escalation where safeguarding concerns are identified.

The College retains safeguarding oversight for students and apprentices when they are attending employer premises, work placements, subcontracted provision or alternative provision. Employers and providers must know how to report safeguarding concerns, must respond promptly to welfare and attendance concerns, and must cooperate with the College where safeguarding information needs to be shared to protect a student or adult at risk.
Attendance is a safeguarding matter. Persistent absence, unexplained absence, repeated lateness, sudden disengagement, failure to attend work placement or apprenticeship activity, and students who become missing from education must be monitored, recorded and escalated where safeguarding concerns may be present. Staff should consider links with neglect, exploitation, mental health, domestic abuse, family stressors, SEND, care experience, homelessness, transport barriers and adult safeguarding concerns.

The College recognises that repeated, unexplained or prolonged absence from education may be an indicator of abuse, neglect, exploitation, mental health concerns, family difficulties or other safeguarding risks. Staff must remain professionally curious about attendance concerns and ensure that safeguarding information is shared promptly where patterns emerge. Attendance concerns should be considered alongside the wider context of the learner’s wellbeing and safety.

6.4.4 College staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and work together to give children/young people the help they need. Staff receive training to develop their knowledge and skills in this area.

6.5 Abuse and Safeguarding Concerns

6.5.1 Abuse

To ensure that all students are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm or by failing to act to prevent harm. Abuse can also take place online and/or in conjunction with daily life. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

All staff should be aware that safeguarding incidents and poor behaviours can be associated with factors outside the college and/or can occur between students outside of college. This links closely with contextual safeguarding and specific young people being more at risk due to the circumstances in which they live.

There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

6.5.2 Physical Abuse

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

6.5.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or young person, which is intended to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age- or developmentally inappropriate expectations being imposed on children and young people. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction.
It may involve seeing or hearing the ill-treatment of another or may involve serious bullying, causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and young people.

6.5.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as forcing children and young people to view sexual material, watch sexual activities, share or create sexual images, or behave in sexually inappropriate ways.

6.5.5 Neglect

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

6.5.6 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. Staff are well placed, however, to identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where young people have suffered abuse and neglect or any other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout adolescence and into adulthood. It is vital that staff are aware of how these experiences can impact on mental health, behaviour and education. If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following normal procedures.

Staff should be alert to indicators that may suggest a safeguarding concern linked to mental health, including significant changes in behaviour, withdrawal, emotional distress, sleep difficulties, self-harm indicators, neglect of self-care, unexplained decline in attendance, engagement or achievement, and changes in peer relationships. Where there is immediate risk of harm, staff must take urgent action, including contacting emergency services where appropriate, and must inform the safeguarding team as soon as possible.

6.5.7 Child Criminal Exploitation (including County Lines)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person or vulnerable adult into criminal activity. This may involve an exchange for something the victim needs or wants, and gives a financial or other advantage to the perpetrator or facilitator. Violence or the threat of violence is commonly used to this end.

Children can be exploited by adult males or females, as individuals or in groups. 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.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
Indicators of CCE can include:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Being absent from college
- Not taking part in education

If a member of staff suspects CCE, they should discuss this with a safeguarding officer. The DSL will refer to the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

County Lines is a term used for gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated phone lines or other forms of deal line. They target vulnerable groups of children and young people. The victims carry the drugs/ money and, in return, are offered, promised or given something tangible such as money, drugs or clothes or intangible such as status or protection. There is a direct link with CSE and CCE due to the imbalance of power. Victims can be coerced into county lines to prevent something negative happening to themselves or their family. The Government has now created a National Referral Mechanism (NRM) to support a multi-agency approach and a unified approach by police forces.

6.5.8 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

6.5.9 So Called 'Honour Based Abuse' (HBA)

These encompass incidents or crimes which have been committed to protect or defend the honour of the family and/or community and include FGM, forced marriages and practices such as breast ironing. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

6.5.10 Female Genital Mutilation

Female Genital Mutilation (FGM) 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 abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

The tutorial programme will cover aspects of FGM and other harmful practices, including forced marriage and honour-based abuse. The college will ensure that students are taught the concepts of, and laws relating to forced marriage, honour-based violence and FGM, and how these can affect current and future relationships.

If staff have a concern regarding a girl that might be at risk of FGM, they should inform a member of the safeguarding team. Since 31 October 2015, there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place.

Mandatory Reporting of FGM

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, 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. 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, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the college’s designated safeguarding lead and involve children’s social care as appropriate.

6.5.11 Forced marriage

Forcing a person into marriage is a crime. 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 of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional, or psychological.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the Safeguarding Team.

A safeguarding officer will:

- Speak to the student about the concerns in a secure and private place
- Refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

6.5.12 Child-on-Child Abuse

Child-on-Child Abuse is when children and young people abuse other children and young people. This type of abuse can take place inside and outside of college and online, and it is important that when staff have concerns they speak to the DSL or deputies.

Child-on-Child Abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Discriminatory behaviour, including racism, faith-targeted abuse, prejudice-based harassment, discriminatory bullying and other conduct targeting a child or young person because of race, ethnicity, nationality, religion, belief, disability, sex, sexual orientation, gender identity or any other protected or perceived characteristic

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual self-generated intimate images and/or videos, including those created or altered using artificial intelligence such as deepfakes
    - Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
    - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where young people abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Staff should be alert to the influence of misogyny, online communities, coercion, exploitation and harmful sexual behaviour. The College will challenge language and behaviours that normalise sexual harassment, sexual violence, prejudice or abuse, whether these occur face to face, online, on college transport, during work placements or in the wider community.

The safeguarding response to child-on-child abuse will include, where appropriate, immediate safety planning, risk assessment, support for the victim, support and management of the alleged perpetrator, consideration of wider peer group or cultural issues, educational safeguards, liaison with parents or carers where appropriate and safe, and referral to external agencies including children's social care or police where thresholds are met. Online and off-site incidents will be treated with the same seriousness as incidents occurring on College premises.

6.5.13 Sexual Violence and Harassment

Sexual violence and sexual harassment can occur:

- Between children and young people of any age and sex
- Through a group sexually assaulting or sexually harassing an individual or another group
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.
Victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Incidents that occur online or out of college should be taken just as seriously and responded to in the same way as reports on college premises.

Some groups are potentially more at risk. Evidence shows that girls, students with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) students are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not inevitable
- Recognising, challenging and recording prejudice-based harm, racism, faith-based prejudice, faith-targeted abuse and other discriminatory behaviour as safeguarding concerns where appropriate
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Staff should refer to the College's Sexual Violence and Harassment Policy for more information.

6.5.14 Serious Violence

Indicators which may signal that a student is at risk from, or involved with, serious violent crime may include:

- Increased or persistent absence from college
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the student has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school or college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Any concern that a student is carrying, using, threatening to use, or expressing intent to use a weapon must be reported immediately to the DSL or deputy. Staff should follow emergency procedures where there is immediate danger and should not place themselves or others at risk. Where safe and appropriate, staff may use de-escalation strategies and should ensure that peer conflict, intimidation, coercion and retaliation risks are considered as part of the safeguarding response.

6.5.15 Domestic Abuse

Domestic abuse can be, but not limited to, psychological, physical, sexual, financial, or emotional. It can be single incident or a series of incidents and patterns of behaviour. Children and Young People can be victims of domestic abuse. They may hear, see or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Children are recognised as victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse. Domestic abuse may affect attendance, behaviour, emotional wellbeing, learning, relationships and safety. Staff must record and report concerns promptly, including where abuse affects an apprentice, adult learner, family member or intimate relationship, and the safeguarding team will consider whether children's social care, adult social care, police or specialist domestic abuse services should be involved.

6.5.16 Radicalisation and Extremism

Protecting students from the risk of radicalisation should be seen as part of the college's wider safeguarding duties and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised.

- Radicalisation is the process of a person legitimising support of, or use of, terrorist violence.
- Extremism is vocal or active opposition to our fundamental values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes with or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
The college has a duty to prevent students from being drawn into terrorism. The Safeguarding Team undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify those at risk.

The college will assess the risk of students being drawn into terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with our local safeguarding partners and local police force.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Students who are susceptible to radicalisation may have low self-esteem or be victims of bullying or discrimination.

If staff are worried about a student, they should discuss their concerns with a safeguarding officer and record their concerns on CPOMS.

6.5.17 Online Safety

The College recognises the importance of safeguarding students from potentially harmful and inappropriate online material and understands that technology is a significant component in many safeguarding and wellbeing issues.

The College addresses this by:

- Having robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Educating students through the tutorial programme regarding safe and responsible use of technology, including protecting private information, using social media and how to identify if material is unsafe or biased
- Establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Utilising filtering and monitoring software to respond to concerns

Our approach to online safety is based on addressing the following categories of risk:

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

All staff receive online safety training as part of induction and through regular safeguarding updates. Training will include online harms, filtering and monitoring, AI-related risks, misinformation and disinformation, harmful sexual behaviour online, self-generated intimate images, grooming, radicalisation, cyberbullying, harassment, privacy and data protection risks.

All students, staff, volunteers and visitors sign the acceptable use policy when accessing the college network and systems.

Information for parents will be shared on our website regarding our approach to online safety.

Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.
- LSEC recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- LSEC will treat any use of AI to access harmful content or bully students in line with this policy and the college's anti-bullying policy.
- Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. LSEC's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

The College will consider AI-related risks within online safety, safeguarding and data protection arrangements, including generated or manipulated intimate images, impersonation, grooming, misinformation, extremist content, harassment, academic misuse and privacy risks. Any AI-related concern involving harm, abuse, exploitation or risk to a student must be reported through safeguarding procedures.

AI-generated or manipulated sexual imagery of children, including deepfakes, nudification images or videos and coerced image-based abuse, will be treated as a safeguarding concern and may constitute a criminal matter. Such concerns must be reported immediately to the safeguarding team and responded to in line with online safety, child-on-child abuse, sexual violence and harassment, information sharing and police referral procedures.

Filtering and monitoring responsibilities will be clearly assigned, reviewed at least annually and checked to ensure that systems remain effective, proportionate and responsive to safeguarding need. The review will consider student age, vulnerability, SEND, curriculum requirements, personal and managed devices, remote access, emerging online harms and any lessons learned from incidents or audits.

The DSL will be involved in filtering and monitoring discussions where safeguarding risk, student vulnerability, curriculum access or emerging online harms are relevant. Concerns identified through filtering and monitoring systems must be reviewed promptly, recorded where they indicate safeguarding risk, and used to inform wider safeguarding education, training and governance reporting.

6.6 Where staff identify a cause for concern they should discuss this with a Safeguarding Officer

The Safeguarding Officer will make a referral, if this is appropriate, to the local multi-agency safeguarding hub for the local authority area in which the child lives. Staff and students (where this is possible and appropriate) will be kept informed about the actions taken once the concerns are shared with the college safeguarding officer. The local multi-agency threshold document for the local authority area where the college is going to make a referral should be consulted.

Lack of availability of a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead must never delay action to protect a child. Any member of staff may make a referral directly to Children's Social Care if they believe a child is suffering or likely to suffer significant harm.

6.6.1 If at any time it is considered that the child may be a child in need as defined in the Children Act

1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.

A child in need is defined under section 17 of the Act as a child whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired, without the provision of additional services. A child with a disability is a child in need.

6.7 Procedure for Responding to Concerns and Disclosures

6.7.1 College staff who have regular contact with students are well placed to observe significant changes in a young person's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, young people may choose to share their concerns with staff they feel they can trust and with whom they are comfortable.

Staff need to know how to respond sensitively to a young person's concerns and who to approach for advice. Whilst College staff are not responsible for investigating abuse, it is essential that any disclosures or suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on and treated seriously.

The College takes a holistic view of the welfare of its students and recognises that a wide range of contextual factors may be impacting on the wellbeing of a young person. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities, attendance, behaviour and learning differences. The Safeguarding Officer will consider the full picture in dealing with cases brought to her/his attention.

Any learner disclosing abuse, neglect, exploitation or other safeguarding concerns should be reassured that they are being taken seriously, will be supported and kept safe, and will never be made to feel that they are creating a problem by reporting concerns.

The following guidelines should be followed by **all** staff receiving a disclosure:

1. Stay calm and reassure the young person that they are right to tell someone of their concerns.

2. Do not promise confidentiality. Be honest and explain that safeguarding information may need to be shared with the safeguarding team or other relevant agencies where this is necessary, proportionate and lawful to protect the young person or others from harm. Reassure the young person that information will only be shared with those who need it for safeguarding or welfare purposes.

3. Allow the student to speak in their own way and at their own pace; avoid interrupting when they are recalling significant events.

4. Do not be judgemental but make a professional assessment about the likelihood of harm occurring.

5. Do not 'interview' the young person; do not ask leading questions. Ask factual questions to gather as much information as possible and to create a full picture of what has happened so that this can be reported to a safeguarding officer.

6. Only clarify what the young person is trying to say and ascertain whether there are any immediate issues of safety for the young person or any other children.

7. Notify the Safeguarding Team by recording on CPOMs, as soon as possible and that working day, noting as accurately as possible what was said using the young person's own words. Include the time, context and location of the disclosure. **If the concern is urgent, verbally**

inform the Safeguarding Officer immediately in person and record on CPOMs later.

8. Do not investigate any suspicions, allegations or incidents of abuse, but report them within the hour (or as soon as practicable) to a Safeguarding Officer and pass on all written notes.

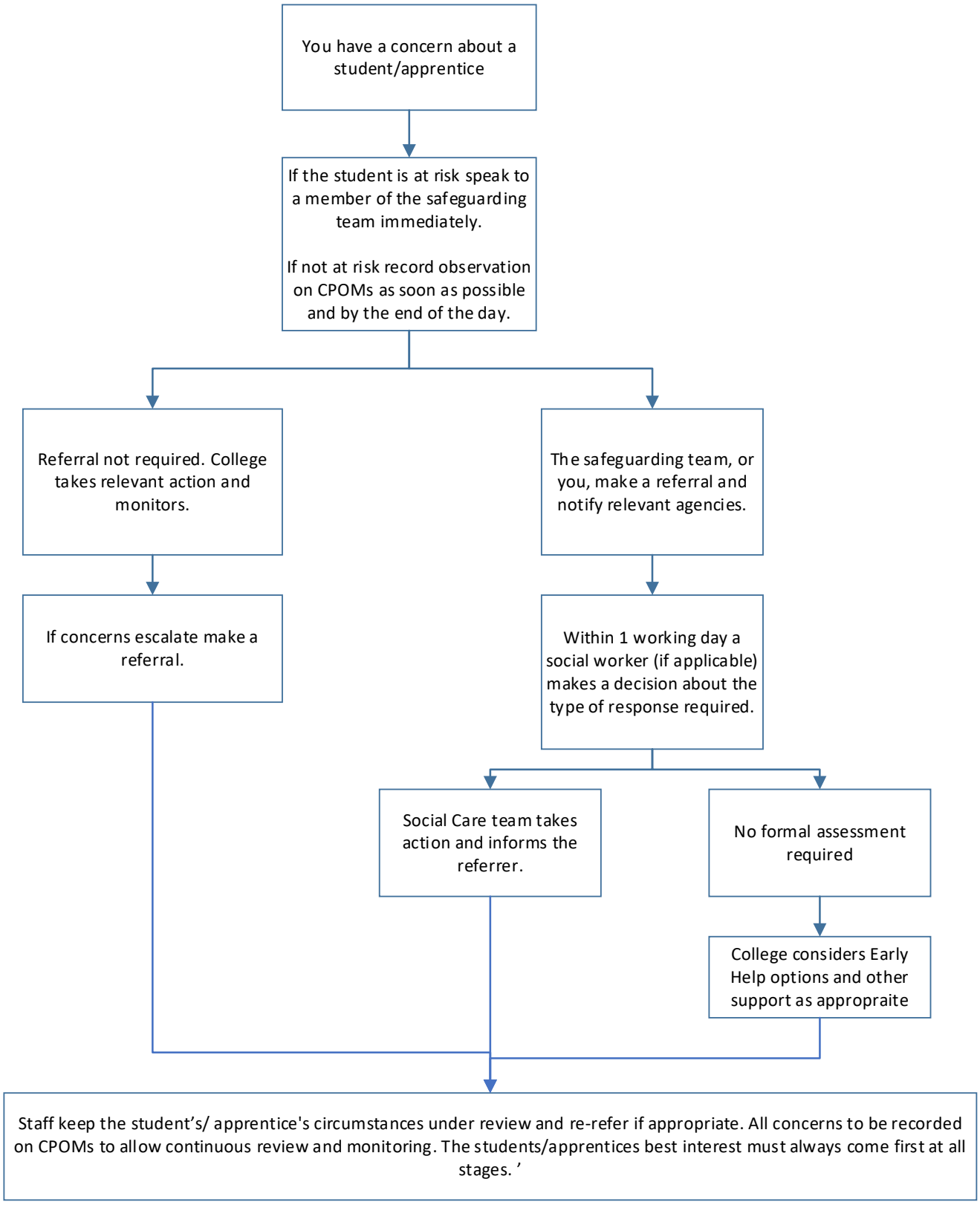
9. Record the concern promptly and factually. Include the date, time, location, context, the young person's own words where possible, actions taken, decisions made, rationale for decisions, who information was shared with, and any immediate safety planning or follow-up required.

10. Where there is a concern that a young person is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm ', the Designated Safeguarding Lead will refer immediately to Children's Social Care (CSC) at the appropriate local authority.

11. Where there is concern of an immediate threat to life, emergency services must be contacted immediately.

12. In exceptional circumstances, if the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads are not available, advice should be sought from the duty manager or a member of the Senior Leadership Team. All staff have a right and responsibility to refer concerns directly to Children's Social Care if necessary.

13. In the case of disclosure from an adult at risk, referrals will be made to appropriate adult services e.g. adult social care.



6.7.2 Out-of-hours arrangements

During the evening opening safeguarding cover is provided by the duty manager. A concern may also be raised with the duty manager if a safeguarding officer cannot be located. A safeguarding role is included in duty management training.

6.7.3 The Child's/Adult's Wishes and Consent

The wishes, feelings and views of the child or adult about whom a concern has been raised should be listened to, taken seriously and recorded. Safeguarding decisions should be child-centred and should explain, in an age-appropriate and accessible way, what action is being taken and why. The individual's wishes should be considered unless doing so would prevent the College or safeguarding partners from protecting them or others from harm.

Consent should normally be sought before sharing information where this is appropriate and safe. However, information may be shared without consent where there is a lawful basis to do so, including where seeking consent would place a child or adult at risk, prejudice the prevention or detection of crime, or prevent timely safeguarding action. Fears about sharing information must not stand in the way of safeguarding and promoting welfare. Decisions to share, or not to share, information must be recorded with the rationale.

The Designated Safeguarding Leads will normally seek to discuss any concerns about a child with their parents/carers. This must be handled sensitively, and the DSL will contact the parent in the event of a concern or disclosure.

However, if the DSL believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care.

6.8 Data Management

6.8.1 As set out in the Government publication Data Protection: A Toolkit for Schools (DfE, April 2018), data protection requirements 'do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if gaining consent places a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place'.

6.8.2 The implementation of this policy requires the processing of personal and sensitive data of students and/or members of staff. This will be done in accordance with the terms of Data Protection legislation as amended by the General Data Protection Regulations (2018) (GDPR) and as set out and interpreted in the College's data management, storage, retention and disposal policies and related statements.

6.8.3 The main requirements under the current legislation and College policy are as follows:

- data subjects will be informed what data is being collected and for what purposes
- data will be stored safely and securely with robust access arrangements in place
- consent to share data will be requested where/when this is necessary
- data will only be shared on a need-to-know basis and using secure transfer mechanisms
- data will not be retained for any longer than is necessary
- safeguarding information will be shared where it is relevant, necessary, proportionate, accurate and timely to safeguard or promote the welfare of a child, young person or adult at risk. Consent should be sought where appropriate and safe, but consent is not always required and must not delay safeguarding action. Staff must distinguish between consent to receive a service and the lawful basis for sharing information for safeguarding purposes.
- where the statutory information sharing duty applies, relevant safeguarding information should be shared with appropriate safeguarding partners, agencies or practitioners where it may assist them to exercise safeguarding functions or provide safeguarding or welfare services. Information should not be shared where doing so would be more detrimental to the child than not sharing it. Decisions to share, or not to share, information must be recorded with the rationale.

- where proportionate and necessary, safeguarding information may include information about parents, carers, adults or other individuals connected to the child where this is relevant to understanding risk, need, protective factors or appropriate support.
- digital and hard copy data will be securely destroyed when it is no longer needed, or the retention period has expired.
- safeguarding information should follow the child or young person across transitions, including movement between schools, colleges, alternative provision, apprenticeships, work placements, subcontracted provision, adult services and relevant support services. Information should be shared securely, promptly and in accordance with local safeguarding arrangements.

7. Safeguarding Records and Transfer of Safeguarding Files

7.1 Recording a Safeguarding Concern

A written record of a safeguarding concern should be made by any member of staff or volunteer and submitted to the safeguarding team through CPOMS, by email or hard copy. Safeguarding records must contain a clear and comprehensive summary of the concern, actions taken, decisions reached, the rationale for decisions, outcomes and any ongoing support or risk management arrangements. Records must be factual, proportionate, dated, attributable and stored securely.

7.2 The College will keep records of all safeguarding concerns and cases, including records of partnership work required in order to safeguard or protect a child or young person from risk of harm. These records will be kept away from other student records and kept secure in locked filing cabinets within the safeguarding offices (for paper files transferred to the college) or online on the safeguarding system/secure documents folder on SharePoint.

7.3 Transfer of Safeguarding Files

7.3.1 Transfer of safeguarding files to the College

The College will collect details of the last school/college attended by students and, where the student is under 18, will write to the local authorities to request that any safeguarding records are transferred to the College as soon as possible by an agreed secure method. When the files are received a confirmation receipt will be sent to the former school/college. KCSIE, 2026, states that files must be received within five working days from enrolment.

7.3.2 Transfer of safeguarding files from the College

When a student for whom there is a safeguarding record leaves the College, the DSL will ensure that the safeguarding record/s are transferred to the new school/college once this information is known. The following procedure should be followed:

- Tutors will collect information about the intended destination of a student under 18 transferring from the College and pass this information to MIS.
- The DSL will receive a list every month from MIS with details of young people who will be transferring from the College to a new school/college and who are known to the safeguarding team.
- The DSL will consider whether relevant safeguarding information should be shared in advance of transfer, enrolment, placement or transition where this would support continuity of safeguarding, welfare support, risk assessment or protective planning.
- For each student on the list, the DSL will confirm with the new school/ college that the transfer has, or will be, taking place and, if yes, obtain details of the DSL there
- As soon as the young person has enrolled at the new school/college, the DSL will arrange for the transfer of the file via secure means and ensure receipt is confirmed; the transfer should take place within five days of enrolment at the new provision.

- Where appropriate, the DSL will also share information with the DSL at the new school/college in advance of the student leaving, e.g. where this would allow the new school/college to put relevant support in place for when the student arrives.

8. Reporting and Dealing with Allegations of Abuse Against Members of Staff

KCSIE 2026 identifies the Principal as the main contact for leading processes where safeguarding concerns or allegations are made about members of staff, including supply staff, agency staff, volunteers, contractors and others working on behalf of the College. The CEO delegates this responsibility to the Deputy CEO and Principal, Chief People Officer, Director of HR, Deputy Principal Learner Life, SEND and Stronger Communities and the Group Executive Director Safeguarding, Wellbeing and Inclusion. All are senior members of staff and will keep the CEO informed of allegations, low-level concerns where appropriate, and the progress and outcome of investigations. Where an allegation concerns the CEO, the Chair of Governors will lead the process in liaison with the LADO and relevant statutory agencies.

The Head of Safeguarding, DSL, may be consulted on matters of allegations of abuse against members of staff.

8.1 This procedure applies to all staff employed by or working on behalf of LSEC, including permanent, temporary, supply, agency and visiting staff, trainee teachers, volunteers, governors, contractors, consultants and others undertaking work for or on behalf of the College. HR will maintain records of current and previous staff in accordance with statutory guidance, safer recruitment requirements and data protection legislation.

8.1.1 In rare instances, staff working in education have been responsible for abusing children or adults at risk. Alternatively, because of their frequent contact with children and young people, staff may have allegations of abuse made against them. The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay. Guidance on the conduct of staff appears in **Appendix 1.**

8.1.2 It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

8.1.3 In the event of an allegation being made against the CEO/ Deputy CEO and Principal, the Chair of Governors will raise this with the DSL. The purpose of an initial discussion is to consider the nature, content and context of the allegation and agree a course of action. The Chair of Governors will oversee the liaison between agencies such as the police and local authority children's services in connection with allegations against the Principal. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

8.2 Receiving an Allegation about a Member of Staff from a Child or Adult at Risk

8.2.1 The allegation should be reported immediately to either the Executive Principal, Chief People Officer, Deputy Principal Learner Life, SEND and Stronger Communities, Group Executive Director Safeguarding, Wellbeing and Inclusion or Director of HR who will coordinate the following:

- obtaining written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL/HR.
- recording information about times, dates, locations and names of potential witnesses.

8.3 Initial Assessment

8.3.1 Lead Senior staff member should make an initial assessment of the allegation, consulting with HR as well as the Local Authority Designated Officer (LADO) as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LADO.

8.3.2 The College is not to investigate the allegation without being advised by the LADO that an internal investigation is appropriate. The initial assessment should be on the basis of the information received and to determine whether or not the allegation warrants further investigation.

8.3.3 Possible outcomes of the initial assessment are:

- The allegation meets the harm threshold (see section 9.4).
- The allegation/concern does not meet the harm threshold and will be dealt with in line with College staff disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

8.4 Allegations that may meet the harm threshold

8.4.1 The procedures appearing below for the management of allegations apply to all cases in which it is alleged that a teacher or other member of staff (including volunteers) in the College has:

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

This relates to members of staff who are currently working in the College regardless of whether the College is where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

8.4.2 This includes behaviour that may have happened outside of college and that may make an individual unsuitable to work with children, this is referred to as transferable risk.

8.4.3 Allegations that may meet the threshold of risk will be referred to the LADO and the Deputy Principal Safeguarding/DSL/HR will take instruction and advice on how to proceed whilst also ensuring:

- The welfare of the child is considered, supported and not at further risk.
- The person subject to the allegation is supported as appropriate with consultation with the LADO.

8.5 Enquiries and Investigations

8.5.1 Child protection enquiries by social care or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College should assist agencies with their enquiries.

8.5.2 The College shall hold in abeyance its internal enquiries while any formal police or local authority social care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall comply with existing staff disciplinary procedures.

8.5.3 If there is an investigation by an external agency, for example the police, the Deputy Principal Learner Life, SEND, and Stronger Communities and/or Group Executive Director Safeguarding, Wellbeing and Inclusion and/or the Director of HR should normally be involved in, and contribute to, the inter-agency strategy discussions. They are responsible for ensuring that the College gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. HR shall advise the member of staff that they should consult with a representative such as a trade union.

8.5.4 Unless there are objections from the police or other investigating agency, the Deputy Principal and/ or Group Safeguarding/DSL/HR shall:

- Ensure that the parents/carers of the child or adult at risk making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the child/children, adult at risk or parents/carers making the allegation that the investigation is taking place and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Chair of Governors and/or the designated governor of the allegation and the investigation.

8.5.5 Written records will be kept of the action taken in connection with the allegation.

8.6 Suspension of Staff

8.6.1 Suspension should not be automatic but may be considered at any stage of the investigation and should remain under review: All options to avoid suspension should be considered prior to taking that step. The possible risk of harm to children or adults at risk posed by an accused person should be evaluated and managed in respect of the child/ren or adults at risk involved in the allegations.

The appropriate section of the College Staff Disciplinary Policy and Procedure should be followed. The Principal and People Team shall consider carefully who is informed of the suspension and investigation. The LADO and external investigating agencies should be consulted.

8.6.2 If there is no option but to suspend the member of staff, they should be given appropriate support during the period of suspension. The decision to suspend is a neutral act and is taken to safeguard students, the staff member and other members of staff whilst under investigation. They should also be provided with information on progress and developments in the case at regular intervals.

8.7 The Disciplinary Investigation

8.7.1 The disciplinary investigation should be conducted in accordance with the Staff Disciplinary Policy and Procedure following advice provided by a senior member of the HR team.

8.8 Resignations and dismissals

If, during the course of an investigation relating to an allegation of abuse, an employee tenders their resignation, or ceases to provide their services, the College will continue to investigate and conclude the allegation in accordance with these procedures and statutory guidance. Every effort will be made to reach a conclusion in cases relating to the welfare of children or adults at risk, including those where the person concerned refuses to co-operate with the process. The outcome

of the investigation will be communicated to the staff member and relevant agencies as appropriate.

8.8.1 If the College dismisses or ceases to use the services of a member of staff because of serious misconduct or might have dismissed them if they had not resigned, the College must still consider whether a referral to the Disclosure and Barring Service is warranted. If the criteria for a referral are met, it is not appropriate to reach a settlement/compromise agreement.

8.9 Unsubstantiated or malicious allegations

8.9.1 If the allegation is found to be unsubstantiated, the DSL will refer the matter to children/s or adult social care so that it can be determined whether the child or adult at risk needs support services or may have been abused by someone else.

8.9.2 If a report is shown to be deliberately invented or malicious, the college will consider whether any disciplinary action is appropriate against the individual who made it in accordance with our behaviour policy.

8.9.3 In consultation with the named Senior Leaders (Deputy CEO and Principal/ Group Executive Director Safeguarding, Wellbeing and Inclusion or delegated senior leader) HR will:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

8.10 Low Level Concerns

8.10.1 We encourage an open and transparent culture where all concerns about an adult working with students which do not meet the threshold are dealt with promptly and appropriately.

All low-level concerns must be reported, recorded and reviewed in line with the Staff Code of Conduct, safeguarding procedures and HR processes. Staff are encouraged to self-report where they believe their own conduct may have fallen below expected standards. Records will be held securely and reviewed to identify patterns, repeated concerns, culture issues or escalation risks. Where a pattern of behaviour or new information indicates that the harm threshold may be met, the concern must be escalated to the LADO without delay.

8.10.2 A low-level concern is described in KCSIE 2026. It does not mean it is insignificant – it is any concern no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the college may have acted in a way that:

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

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

- Being over-friendly with students.

- Having favourites.
- Taking photographs of students on their mobile phone contrary to college policy.
- Engaging with a student on a one-to-one basis in a secluded area.
- Humiliating students.

8.10.3 Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

8.10.4 Low-level concerns can be self-referrals if staff are aware of a situation that should be noted and reviewed.

8.10.5 If a member of staff has any concerns, no matter how minor, they should be shared directly with either the Deputy CEO and Principal, Deputy Principal Learner Life, SEND and Stronger Communities, Group Executive Director Safeguarding, Wellbeing and Inclusion and Group Safeguarding, Chief People Officer or Director of HR. A low-level concern form should be completed and shared to keep a record (**Appendix 2**).

8.10.6 Low-level concerns can be shared anonymously and where possible anonymity will be preserved.

8.10.7 Following receiving a low-level concern form the senior lead will review and assess the concern and speak to any staff members. If assessed as meeting LADO threshold, then LADO processes will commence. Outcome of low-level concern could be:

- No Further Action.
- Organisational learning/culture development.
- Training.
- Disciplinary (in line with Disciplinary Policy).

8.10.8 Low-level concerns regarding agency staff and contractors should be referred to their employers.

Records will be kept securely for the duration of the staff member's employment with LSEC and reviewed if a pattern of concern emerges. Where low-level concerns relate to agency staff, contractors or volunteers, appropriate information will be shared with the employer or commissioning organisation, and any safeguarding threshold concerns will be referred through LADO or statutory routes.

8.10.9 Information will not be shared on references unless it has met the threshold of harm for LADO.

8.11 Confidentiality

8.11.1 It is essential that when an allegation is made, the College makes every effort to keep confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where the material would identify the teacher as the subject of the allegation).

8.11.2 The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so.

8.11.3 Senior case leads should take advice from, for example, police and children's social care to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

8.12 On concluding a case

8.12.1 If the accused member of staff leaves the employment of the College, a decision must be made about whether to make a referral to the DBS.

8.12.2 Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Director of HR should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Senior Case Leads should also consider how the person's contact with the child or adult at risk who made the allegation can best be managed.

8.13 Records

8.13.1 Documents relating to an investigation should be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

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

8.14 Monitoring Effectiveness

8.14.1 Where an allegation has been made against a member of staff, the DSL should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the LSCP. Consideration should also be given to the training needs of staff.

9. Recruitment and Selection

9.1 The College has an established recruitment and selection policy and People process that seek to identify individuals who are unsuitable to work with children.

9.2 The College will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with children, young people and adults at risk. The process ensures compliance with guidance issued by the Department of Education, Ofsted, UK employment legislation and appropriate professional bodies e.g. CIPD.

9.3 In line with KCSIE 2026, the People Team will conduct online searches for shortlisted candidates as part of safer recruitment. Searches will be proportionate, related to suitability to work with children, young people and adults at risk, and undertaken in a way that is consistent, fair and compliant with data protection and equality requirements. Any relevant information will be shared with the recruiting manager to be explored at interview, and the discussion and rationale will be recorded on the interview template. Potential areas of concern include, but are not limited to:

- Discriminatory posts, language or sharing of discriminatory information.
- Inappropriate images of children or vulnerable adults.
- Posts or information shared of a violent and aggressive nature.
- Content that may demonstrate that they pose a transferable risk or are inappropriate to work with children and vulnerable adults.
- Information suggesting unmanaged safeguarding risk, extremist or terrorist content, harmful sexual behaviour, misogyny, harassment, exploitation, abuse, or conduct that may indicate transferable risk.

9.4 All College staff must have a current DBS check. The detailed requirements for DBS checks, operated by the People Team, are set out in the DBS Disclosure and Storage Policy and Procedure and cover the DBS requirements applicable to directly employed staff, agency staff, contractors, non-employees (including volunteers), governors and visitors. A risk-based approach is taken to volunteers and other non-employees depending on the frequency of contact with students, level of supervision by the College and nature of the activities engaged in. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

9.5 KCSIE requires a DBS to only be completed on entry to employment however, best practice is the implementation of regular DBS renewals for all members of staff. All staff have their DBS renewed by the College every three years unless they are subscribed to the update service, in which case the service will be checked every 3 years by the People Team.

9.6 No member of staff should undertake regulated activity or be unsupervised at any time while on College sites without a DBS check with the relevant barred lists checked. If not received before the first day of work at a College campus, then a current DBS through a previous employer is acceptable for a period of up to three months and a risk assessment will be undertaken. 'Current' means that the check was completed within the last three years.

10. Staff Code of Conduct and Sharing Personal Circumstances

Staff are expected to read, understand and adhere to the staff code of conduct, reviewing expectations at a minimum at the beginning of every academic year.

As well as safer recruitment checks, it is a requirement for all staff to share if their personal circumstances change that may affect their work and suitability to work with children and vulnerable adults. This includes (but is not limited to):

- Subject to a police investigation or new criminal conviction.
- Open to a Section 47 investigation or children in their personal care are open to a Child in Need or Child Protection Plan.
- A personal situation which may result in their circumstances being a transferable risk to the students they are working with.

Following a member of staff informing the named Senior Leaders, they will review and risk assess the potential risk in consultation with the Deputy CEO and Principal, Group Chief People Officer, Designated Safeguarding Lead and/or relevant Assistant Principal if required.

11. Training Requirements

11.1 New staff will be issued with this policy as part of their induction and prior to taking up post at the College. Additionally, all new staff will be provided with the latest required safeguarding reading for school and college staff, including Part One of KCSIE 2026. Staff will be required to complete a short assessment, with a pass rate of 80%, to check their understanding.

11.2 All new staff will be required to undertake specified, online initial awareness-raising activities covering safeguarding and the Prevent Duty and confirm that they have done so prior to taking up post and must attend a face-to-face session prior to the first day. In exceptional circumstances, if this is not possible, a risk assessment must take place and training must commence in the first week of employment.

11.3 All staff must attend annual refresher safeguarding and Prevent training. In addition, staff will receive updates via email, meetings or bulletins to keep their skills and knowledge up to date.

11.4 Compliance with attendance at mandatory training within agreed timescales for both new starters and existing staff is monitored and, in the case of non-compliance, is followed up with managers to ensure that understanding of all staff remains current. Compliance data are reported to the Governing Body via the Annual and Mid-Year Reports.

11.5 Training is also a requirement for governors, other regular volunteers/visitors, contractors and external support workers. College training opportunities are also available to some partner organisations e.g. those delivering sub-contracted provision.

11.6 All Governors will receive safeguarding, including child protection, as part of their induction to their position, which will be refreshed on a bi-annual basis (as a minimum).

11.7 All training is recorded on the Single Central Record (SRC), the centrally held list of all current staff, together with a record of their DBS status, that reference checks have been carried out and that the staff code of conduct has been signed.

12. Whistleblowing

12.1 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 College's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. Appropriate whistleblowing procedures should be in place for such concerns to be raised with the College's Senior Leadership Team'*.

12.2 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 central safeguarding team in the first instance. If the person raising the concern is not satisfied with the response and believes there are significant failings in the College's arrangements, then the College's Complaint Policy (which is available on SharePoint) should be consulted. This sets out how to raise a concern firstly within the College and, if necessary, outside the College.

12.3 KCSIE 2026 publicises the NSPCC's reporting abuse dedicated helpline. This is independent of the College and 'available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college'. Staff can call 0800 028 0285 – line is available 8:00 AM to 8:00PM Monday-Friday and email help@nspcc.org.uk.

13. Complaints

13.1 Complaints about the handling of safeguarding issues should be sent to the DSL. If the complaint is about the DSL, it will be dealt with via the College's complaints procedure.

14. Policy Review

14.1 The effectiveness of this policy will be kept under continuous review in the light of experience, safeguarding data, statutory guidance, London Safeguarding Children Procedures, local safeguarding partnership updates, audit findings, inspection outcomes and best practice. This will involve consultation with staff, managers, students where appropriate and the Safeguarding Steering Group. The policy must be checked promptly following publication of the final KCSIE

2026 statutory guidance and updated where the final guidance differs from the draft consultation version.

The Policy will be subject to annual approval by the College's Governing Body or, as necessary, substantive changes are required in-year.

Appendix 1: Staff Code of Conduct

STAFF CODE OF CONDUCT

The purpose of this Code of Conduct is to help you to be clear about the standards of behaviour expected of you while you are an employee at the College. Whilst the Code of Conduct forms a part of the contract, some of the statements below have an advisory dimension and should help staff to avoid involvement in activities that could lead to misconduct. It is not intended to be an exhaustive list of dos and don'ts, rather, its intention is to indicate the main areas of appropriate conduct and to illustrate the standards expected.

Whereas an employer has a duty of care for any employee, the employee has a duty of trust for exercising professional responsibilities, or simply for being an educational worker, the obligations of this trust are considerable. If you are unclear about any aspect of it or if you are not certain whether a particular aspect of conduct is acceptable, you should seek guidance from your line manager, a senior member of staff or the People Team.

This Code of Conduct applies to all staff and workers employed by the College and to volunteers who work on its behalf. References to 'staff' are taken to include workers and volunteers as appropriate.

All those who visit the college are entitled to expect the highest standard of behaviour from staff, and it is your duty to support the good name of the college in the community. You have a particular duty to ensure that your behaviour is appropriate when dealing with students or their parents or guardians.

1. You should, under all circumstances, treat other employees, students and College users with courtesy and respect.

2. You should not enter into any other employment or activity which would interfere with your duties at College. Teachers have a contractual duty to inform the College if they accept employment additional to their work at the College.

3. You should, under all circumstances, comply with reasonable requirements or instructions given to you by College management and carry out your duties with integrity, care and diligence.

4. You must not demean or undermine students or their parents, guardians or carers. The learning and well-being of students is at the centre of our professional and administrative practice. Similarly you must not demean or undermine the work of the College or your colleagues.

5. The College is committed to promoting equality of opportunity and accepting and valuing individual differences for all employees, students or other College users and you should not act in any way which is discriminatory towards individuals or groups including for reasons of age, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

6. You should, under all circumstances, take reasonable steps to ensure the health, safety and welfare of yourself, other employees, students and College users. All accidents, incidents and near misses must be reported promptly. You must be clear when students are under your supervision as to what your responsibilities are.

7. You must take responsibility for, and be committed to, promoting and safeguarding the welfare of children, young persons and vulnerable adults whether responsible for, or in contact with, them.

8. Whilst on site you must wear a College identity badge which is visible at all times and ensure that any visitor for whom you are responsible is signed in at Reception, supervised appropriately and also wears a visible badge. It is also your responsibility to ensure volunteers or contractors meet the requirements to safeguard students if you are responsible for their work at the College.

9. Staff and student intimate personal relationships are considered an abuse of power and are forbidden under our existing HR policies and staff code of conduct. All pre-existing relationships must be disclosed under our HR policies. You must not enter into any form of sexual relationship with a student, whether they are under 18 or an adult. It is an offence under the Sexual Offences Act 2003 for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. Any improper relationship is a breach of trust. Where a close personal relationship already exists with a student over 18 you have a responsibility to disclose this in confidence to your line manager or a suitable senior member of staff. Such a relationship should be conducted appropriately to avoid negative perceptions from other members of staff or students. Any disclosure might need to be shared, in confidence, and this would be discussed with you.

10. Staff must not provide students with their personal details, which include personal mobile phone numbers, home addresses or private social networking sites. Social networking sites or blogs can be categorised as public or private, but it is not unusual for content on private sites to be made public, so staff should be aware that content which may be considered as bringing the College into disrepute may lead to disciplinary action.

11. In the matter of safer working practice, you should refer to the advisory Guidance for Safer Working Practices for Adults Working with Children and Young People.

12. Close personal relationships with another member of staff could, in some circumstances, lead to a conflict of interest or accusations of bias or favouritism. This applies to romantic/sexual relationships, family relationships and business/financial/commercial relationships. Areas of potential risk include: where the two employees are members of the same team; where there is a line management relationship or one is a member of senior management; where one employee could be responsible for promotion, performance management or pay/grading decisions in relation to the other. If any of these situations applies, or if you have any queries about whether you should disclose the relationship, you must talk to the People Team or a member of the Senior Management in confidence. Any such disclosure will be treated by the College sensitively and in confidence. It is likely that some other members of staff will need to be informed. This will be on a strictly need-to-know basis and this will be discussed with you first.

13. Since much of the College's work is of a confidential nature, you should not, under any circumstances, disclose information to anyone whom the College may consider has no right to receive it. The Freedom of Information Act does not entitle access to confidential information about individuals. The College's Freedom of Information and Data Protection policies must be adhered to.

14. Your conduct in your private life is a matter of concern for the College where it damages the College's reputation, makes you unsuitable for educational work or renders your continuing employment unacceptable to your colleagues. Offences relating to violence, dishonesty, substance abuse (including alcohol), sexual offences and possibly other offences are likely to come into this category and could result in action by a regulating body.

15. It is unacceptable professional conduct to misrepresent yourself, your colleagues or students with regard to qualifications, health, contractual duties or other behaviour which unfairly detracts from the position of others or confers personal advantage.

16. You should not, under any circumstances, engage in any form of harassment or bullying. The College will not tolerate any form of harassment or bullying and is committed to ensuring that employees are able to work confidently and without fear of harassment, bullying or victimisation. Therefore, if a complaint is made to the College, it will be investigated promptly, and appropriate action will be taken in line with the College's policy. Where an employee is found to have committed a serious act of bullying or harassment, this will be dealt with under the disciplinary procedure and may be viewed as gross misconduct, which could result in summary dismissal.

17. You may only be absent from work when that absence is authorised or if you are ill. Absence would normally be in accordance with the College's sickness and ill health management, special leave and/or staff development policies.

18. You should always intend and plan to arrive for duty on time and fulfil your work obligations at the times specified.

19. You should not, under any circumstances, attempt to carry out your duties if you are under the influence of alcohol, illegal drugs or other substances which prevent you from doing so competently.

20. You should not, under any circumstances, smoke in the College buildings or grounds except in the area designated for this purpose; this includes e-cigarettes.

21. You should at all times treat College property with care and respect, ensuring its security and that of any College or student money for which you are responsible.

22. Whilst minor gifts or hospitality may be considered as part of the courtesies of working life, you should be cautious about all gifts and hospitality. Where a situation arises where you are uncertain of whether it would be appropriate to accept an offer of a gift or hospitality, the offer should be declined or advice should be sought from a member of the Senior Management. You should ensure that you do not subsequently treat the person who sent the gift more favourably than other customers, students or suppliers. The 'Staff Register of Gifts and Hospitality', held by the Assistant to the Clerk to the Corporation, must be completed in respect of any item that might be considered to have greater than a very small intrinsic value.

23. You must deal with complete integrity with regard to any external agency working with the College and particularly so with regard to the management and administration of examinations and assessment procedures. It is unacceptable professional conduct to fail to comply with the requirements of statutory bodies relating to the examination, assessment and evaluation of student achievement and attainment.

24. As teachers and educational workers we act as role models for students, and we represent the College to the public whose support we rely on. Staff are therefore requested to dress appropriately for their work in a way that enhances the reputation of the College rather than detracts from it and should ensure that they dress in a manner which is functional and suitable for a working environment. Clothing or accessories that are distracting, offensive or that prevent effective communication are not acceptable. Staff must wear personal protective clothing appropriate to areas they work in or visit.

25. It is the responsibility of all staff to report any concerns surrounding a colleague or management of the College either to the Safeguarding Lead or via the Whistleblowing Policy.

26. You should raise questions or issues with your line manager and only escalate matters through the management hierarchy if you are unable to resolve matters.

27. You should seek to resolve workplace issues informally, in the first instance, seeking advice and guidance from the People Team and/or your union.

Appendix 2: Low Level Concern Recording Form

Low Level Concern Recording Form

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that:

- is inconsistent with LSEC staff code of conduct, including inappropriate conduct outside of work, and/or
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO (but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary).

Your Name (optional)	
Your Role (optional)	
Date and Time completing the form	
Name of person(s) who the concern is about	
Details of your concern	Why does this behaviour/incident worry you? How many times has it happened? Has anyone else witnessed this? Does the behaviour breach staff code of conduct and how? Have you spoken to them about it? Date and times of concerns.

Completed by Deputy CEO and Principal/Deputy Principal Learner Life, SEND and Stronger Communities/Group Executive Director Safeguarding, Wellbeing and Inclusion/ Head of Safeguarding/Chief People Officer/Director of HR (delete as appropriate).

Name	
Role	
Consultation with LADO	Yes/No (rationale if no) Record summary of LADO conversation
Conversation with staff member	
Actions and Outcomes	