



Safeguarding and Child Protection

1 Safeguarding Culture Statement

The College is committed to maintaining a strong and proactive safeguarding culture in which the welfare of children is paramount. Safeguarding is embedded in all aspects of College life and is underpinned by a child-centred approach.

We recognise:

- Safeguarding is everyone's responsibility and requires a culture of vigilance, openness and accountability;
- Early identification of need and timely intervention are critical to protecting children from harm;
- The voice of the child must be central to all safeguarding decisions;
- Staff must feel confident to raise concerns, including low-level concerns, without fear of reprisal;
- Professional curiosity is essential and staff must respectfully question and probe when something does not feel right;
- Effective safeguarding depends on strong multi-agency working and appropriate information sharing;
- A trauma-informed approach supports understanding of behaviour and need.

The College promotes an environment where students feel safe, are listened to, and know how to seek help. All decisions are made in the best interests of the child, with safeguarding practice characterised by vigilance, professional judgement, and a commitment to continuous improvement.

2 Policy Statement

2.1 Safeguarding and Child Protection is everyone's responsibility. This policy applies to all staff, volunteers and governors and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

King Edward VI College aims to ensure action is taken in a timely manner to safeguard and promote children's welfare.

2.2 All staff are aware of their statutory responsibilities with respect to safeguarding and are trained in recognising and reporting safeguarding and child protection matters;

2.3 The College recognises some children have an increased risk of abuse, and additional barriers can exist which prevent recognition or disclosure. We are committed to anti-discriminatory practice and recognise the diversity of children's experiences whilst ensuring all children receive an equal level of protection, regardless of any barriers they may face.

We are mindful of and give special consideration to children who:

- have special educational needs or disabilities;
- are young carers/have caring responsibilities;
- may experience discrimination due to race, ethnicity, religion, gender identification or sexuality;
- where English is an additional language;
- are living in challenging circumstances including temporary accommodation, or where there are challenges around domestic or substance abuse;
- are at risk of Female Genital Mutilation, sexual and/or criminal exploitation, forced marriage or radicalisation;
- are asylum seekers;
- are at risk due to their own or a family member's mental health needs;
- are Children Looked After or Children Previously Children Looked After, or live in a kinship care arrangement;
- are supported (or have been supported) by a social worker;
- have unexplainable and/or persistent absences from education.

3 Statutory Framework

- 3.1** This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education 2026](#) which applies to providers of post 16 education as set out in [The Education and Training \(Welfare of Children\) Act 2021](#)), [Working together to safeguard children 2026 Academy trust governance guide](#) and, [Meeting digital and technology standards in schools and colleges](#) (updated April 2026). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners; <https://dudleysafeguarding.org.uk/>
- 3.2** The policy is also based on Section 157 of the [Education Act 2002](#), which places a duty of schools, colleges and local authorities to safeguard and promote the welfare of students, and [The School Staffing \(England\) Regulations 2009](#) which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques;
- 3.3** The policy is also based on [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children, section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover FGM appears to have been carried out on a girl under 18, and [Statutory guidance on FGM](#) which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;
- 3.4** It is also based on [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children; [Safeguarding Vulnerable Groups Act 2006](#), which defines 'regulated activity' in relation to children; [Statutory guidance on the Prevent duty 2023](#) (updated March 2024), which explains our duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism, and [Information Sharing \(2024\)](#).

The policy is also informed by [The Human Rights Act 1998](#) which explains how being subjected to harassment, violence and/or abuse, including of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#), and [The Equality Act 2010](#) which makes it unlawful to discriminate against people regarding

particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).

This means our governors and the Principal carefully consider how they support our students about these characteristics and allows our college to take positive action to deal with disadvantages affecting students (where we can show it's proportionate), including making reasonable adjustments for students with disabilities. For example, this could include taking positive action to support girls where there is evidence which indicates they are disproportionately subjected to sexual violence or harassment. Furthermore, The [Public Sector Equality Duty](#) explains how we must have due regard to eliminating unlawful discrimination, harassment and victimisation and helps us focus on key issues of concern and how to improve student outcomes, including for those students who are more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination.

3.5 This policy has taken our locally agreed multi-agency procedures, implemented by the three safeguarding partners:

- The local authority;
- Integrated care boards (previously known as clinical commissioning groups) for an area within the local authority;
- The chief officer of police for a police area in the local authority.

Dudley's procedures are available via <https://dudleysafeguarding.org.uk/> and [DSPP-Continuum-of-help-and-support-June-2025](#)

The safeguarding priorities for Dudley 2024/26 are:

- Mental Health of Children, Young People and Adults with care and support needs, including the impact of parental mental health
- Transitional Safeguarding
- Exploitation

These are detailed further on the above website and are included in whole college training.

In addition, the Dudley Early Help Strategy 2024-2027 has five priorities which are:

- Better Experiences for Families
- Better Access to Services
- Improved Communication
- Improve Culture and Practice
- Improve our Co-Production with Families

Further details are available at [Early Help Strategy](#)

Early help is support provided as soon as concerns emerge to prevent escalation.

Early Help and Family Help at the College are delivered through clear safeguarding pathways. In-college, early help is provided through pastoral systems and coordinated by the DSL and safeguarding team to support students at an early stage. Where concerns

indicate a student's needs exceed what can be managed through college-based support, the DSL will consider escalation to Family Help, which involves targeted, local-authority-led multi-agency intervention. Decisions about escalation are informed by assessment of risk, impact and local thresholds. Students may be identified for early help where concerns include repeated removal from class, an altered programme of study, or other indicators of vulnerability.

4 The Designated Safeguarding Lead

4.1 The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team. The DSL is Sarah MacKenzie (Assistant Principal for Student Support), who is also the Designated Senior Mental Health Lead. The DSL takes lead responsibility for child protection and wider safeguarding across the College, including oversight of online safety and a clear understanding of the College's filtering and monitoring arrangements on college devices and networks to help keep students safe online.

During term time, the DSL and members of the safeguarding team are available during normal college hours to provide advice and support to staff and to discuss any safeguarding concerns that may arise. Arrangements are in place to ensure there is always appropriate safeguarding leadership available during the college day, in line with statutory guidance.

When the DSL is unavailable, deputy DSLs provide appropriate cover and act with delegated authority. The Deputy DSLs are:

- Laura Day (Senior Safeguarding Officer / Senior DDSL)
- Lowri Saenger (SENCo / DDSL)
- Rebecca Williamson (Lead Tutor / DDSL)
- Sam Watkins (Lead Tutor / DDSL)
- Mehdi Didarzadeh (Lead Tutor / DDSL)
- Emily Guest (Lead Tutor / DDSL)
- Nikki Hadley (Lead Tutor / DDSL)
- Stuart Parkes (Lead Tutor / DDSL)
- ~~Aimie Chatfield (Medical Welfare Officer)~~

In addition, the following members of the Senior and College Leadership Team have completed Designated Safeguarding Lead training with the local authority and can deputise for the DSL where required:

- Clare Bramall (Vice Principal)
- Ajay Mehta (Faculty Director)

Clear arrangements are in place for safeguarding support outside of normal college hours and during holiday periods. These arrangements can be accessed via College reception on 01384 398100 in the first instance.

The DSL (and her Deputies) will be given the time, funding, training, resources, and support to:

- Work closely with teachers, share relevant safeguarding information appropriately, and provide advice and support to other staff on child welfare, safeguarding and child protection matters;
- Set out and maintain clear procedures so staff promptly share safeguarding concerns, including ensuring concerns are recorded in writing in line with College systems;
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues children, including children with a social worker, are experiencing or have experienced, with teachers and college leadership staff. This includes ensuring the College and its staff know who these children are, understand their progress and attainment, and maintain high aspirations for them, as well as supporting teaching staff to identify challenges these students may face and the additional academic support or reasonable adjustments that may be required;
- Refer cases of suspected abuse and neglect to local authority children's social care and Family Help services where appropriate, and support staff who make such referrals;
- Refer cases to Prevent where there are concerns about radicalisation and support staff who make referrals;
- Refer cases where a crime may have been committed to the Police;
- Take part in strategy discussions and inter-agency meetings and/or support and enable other staff to do so where appropriate;
- Contribute to the assessment of children, including through Early Help processes and decision-making around escalation to Family Help;
- Work closely with the Designated Senior Mental Health Lead, ensuring alignment between safeguarding and mental health support;
- Refer suspected cases, as appropriate, to the relevant bodies (including local authority children's social care, Prevent, the Disclosure and Barring Service and/or the Police), and support staff who make such referrals directly;
- Have a secure understanding of harmful sexual behaviour, including peer-on-peer sexual harassment and sexual violence, and the links between these and other safeguarding concerns;
- Take strategic oversight and lead responsibility for the College's filtering and monitoring systems and processes, ensuring they are effective, regularly reviewed and understood in practice by staff;
- Know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in cases of sexual violence and sexual harassment, and how to access this support;
- Ensure children have access to an appropriate adult where required, including during police involvement, interviews or searches;
- Keep the Principal informed of safeguarding matters as appropriate and liaise with the local authority designated officer (LADO), case managers and other safeguarding partners where concerns relate to staff or serious child protection matters.

The full responsibilities of the DSL and Deputy DSLs are set out in their job descriptions.

5 The Principal, Governing Body, Trustees and Proprietors

5.1 The Principal is responsible for the implementation of this policy and for ensuring effective safeguarding systems are in place across the College, including:

- Ensuring staff (including temporary and supply staff) and volunteers are informed of the College's safeguarding systems, including this policy, as part of their induction;
- Communicating this policy to parents/carers when their child joins the College and by making it available on the College website;
- Ensuring the DSL has appropriate time, funding, training and resources and robust arrangements are in place to always provide safeguarding cover and access to advice during the college day;
- Ensuring all staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the case manager, where appropriate, in the event of an allegation of abuse made against another member of staff or volunteer;
- Referring cases where a person is dismissed or leaves due to risk or harm to a child to the Disclosure and Barring Service and/or Teaching Regulation Agency, as required;
- Ensuring all low-level concerns about adults working in the College are recorded, reviewed and responded to appropriately, and making decisions in relation to such concerns, in collaboration with the DSL where appropriate;
- Ensuring appropriate leadership oversight of online safety arrangements, including filtering and monitoring systems, in line with statutory guidance;
- Completing appropriate safeguarding and child protection training, including online safety and the management of safeguarding concerns and allegations.

The Governing Body, Trustees or Proprietors will approve this policy at each review, ensure it complies with statutory requirements, and hold the Principal to account for its effective implementation as part of the College's safeguarding arrangements.

The Governing Body/Trust will appoint a senior board-level (or equivalent) safeguarding lead to provide strategic oversight and monitor the effectiveness of this policy in conjunction with the full governing body. This role is independent of the Designated Safeguarding Lead (DSL). The College's Safeguarding Governor is Sian Fletcher.

The Chair of Governors (John Hodt) will act as the 'case manager' if an allegation of abuse is made against the Principal, where appropriate, in line with statutory guidance (see Appendix 1).

The Governing Body will ensure the College has appropriate filtering and monitoring systems in place and will regularly review their effectiveness as part of its safeguarding oversight. This includes:

- Ensuring the leadership team and staff understand the filtering and monitoring systems in place, their role in using these effectively, and their safeguarding responsibilities, including through ongoing training;
- Reviewing the DfE's filtering and monitoring standards and ensuring these are reflected in the College's systems, working with IT staff and service providers as necessary to maintain compliance.

Where another body is providing services or activities on the College premises (regardless of whether the children who attend these services or activities are students at the College), the Governing Body will seek assurance appropriate safeguarding and child protection arrangements are in place. This includes:

- Seeking assurance the other body has appropriate safeguarding and child protection policies and procedures, and requesting sight of these where necessary;
- Ensuring appropriate arrangements are in place for the body to liaise with the College about safeguarding matters;
- Ensuring safeguarding requirements form a condition of use of the College premises and agreements will be terminated where safeguarding expectations are not met.

Where students attend off-site provision, the College will obtain assurance that appropriate safeguarding arrangements are in place. This includes reviewing safeguarding policies, staff suitability checks, and ensuring clear communication routes for safeguarding concerns.

All Governors have read and understood *Keeping Children Safe in Education 2026*. (Part Two of this policy outlines how Governors are supported to fulfil their safeguarding responsibilities.)

5.3 Safer Recruitment

The College ensures safer recruitment practices are embedded within a wider safeguarding culture and operates robust procedures in line with statutory guidance. This includes obtaining and verifying appropriate pre-employment checks, including enhanced DBS checks, barred list checks where appropriate, identity verification, qualifications, prohibition checks and references. Online searches may also be carried out as part of due diligence. All required checks are recorded on the Single Central Record (SCR) and monitored regularly to ensure compliance. At least one member of each appointment panel will have completed safer recruitment training.

6 Safeguarding Policies and Procedures; Legal Responsibilities and Duty to Share Information

6.1 Our safeguarding responsibilities include:

- 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.

6.2 **Definitions:**

Safeguarding and promoting the welfare of children includes protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best possible outcomes.

Child protection is part of the safeguarding process and refers to activities undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development.

(See Section 13 for further detail.)

Exploitation occurs when an individual or group takes advantage of a child to coerce, manipulate or deceive them for personal gain. This can include, but is not limited to, sexual exploitation, criminal exploitation, financial gain or labour, and may occur even where a child appears to have consented.

Self-generated intimate images and/or videos (sometimes referred to as youth-produced sexual imagery) involve children sharing sexual or intimate images or videos of themselves or others. This includes content that is consensual or non-consensual, and material generated or altered using technology or artificial intelligence, such as deepfakes.

Children refers to anyone under the age of 18-

The College will ensure the voice of the child is central to all safeguarding decisions. Children will be supported to express their views, wishes and feelings, and these will be taken into account when determining next steps, alongside an assessment of risk and need.

6.3 The following three **Safeguarding Partners** are identified in *Keeping Children Safe in Education* (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA;)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the local authority;
- The chief officer of police for a police area in the LA area.

7 Roles and Responsibilities

7.1 Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors/trustees in the College and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended college activities, off-site provision and work-related learning. Our college curriculum, including how safeguarding and online safety are embedded, is detailed in Section 21 of this policy.

All staff

All staff, including temporary, agency and supply staff, volunteers and governors/trustees, are required to read Part One of the Department for Education's statutory safeguarding guidance *Keeping Children Safe in Education (KCSiE) 2026* in full. In line with statutory expectations, staff are also required to have regard to relevant annexes according to their role, including the role of the Designated Safeguarding Lead.

All staff must confirm and sign an annual declaration to confirm they have read, understood and agree to comply with the principles set out in KCSiE 2026, and that they will apply the guidance in their day-to-day practice. This declaration is completed at the start of each academic year and reviewed at least annually thereafter.

All staff are required maintain a consistently child-centred and trauma-informed approach, remain vigilant to the signs and indicators of abuse, neglect and exploitation (including online harms and mental health concerns that may require a safeguarding response), and act immediately on any concerns by following the College's safeguarding and child protection procedures.

All staff will reinforce the importance of online safety when communicating with students and parents/carers. They will be made aware of the College's expectations regarding

appropriate online behaviour, the digital platforms and sites students are required to access as part of their learning, and the potential safeguarding risks associated with online interaction. Online safety is recognised as an integral part of the College's safeguarding duty and is treated as a fundamental child protection consideration.

All staff will be aware of:

- The College's systems which support safeguarding and child protection, including this Child Protection and Safeguarding Policy; the Staff Code of Conduct; the Visitor Policy; the safeguarding response to children who are absent from education; and the role, identity and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy DSLs;
- Online safety as a safeguarding issue, including staff expectations, applicable roles and responsibilities in relation to filtering and monitoring systems, the identification of online harms, and the requirement to report concerns in accordance with College procedures;
- Early Help processes and their role within them, including identifying emerging concerns at the earliest possible stage, working with and through the DSL and Deputy DSLs, and sharing information appropriately with other professionals to support timely identification, assessment and intervention;
- The process for making referrals to local authority children's social care, the range of statutory assessments and services that may follow a referral, and the role staff may be expected to play within those processes, including contributing to information-sharing and professional meetings;
- What to do if they identify a safeguarding concern, or if a child discloses they are being abused, neglected or exploited, including specific safeguarding issues such as female genital mutilation (FGM), and how to maintain appropriate confidentiality while ensuring information is shared with relevant professionals to protect the child;
- The signs and indicators of different forms of abuse, neglect and exploitation, including child sexual exploitation (CSE) and child criminal exploitation (CCE), as well as other specific safeguarding issues such as serious violence, radicalisation and harmful sexual behaviour;
- The importance of reassuring children and young people that they are being taken seriously, their concerns will be acted upon, and they will be supported and kept safe;
- The fact that children and young people may be at risk of harm both inside and outside of the home, including within educational settings, the wider community and online environments;
- What to look for to identify children who may need additional help, Early Help or statutory protection, including changes in behaviour, presentation, attendance, mental health or engagement.

Staff Safeguarding Training

All staff members will undertake safeguarding and child protection training, online safety training which includes IT filtering and monitoring roles and responsibilities, together with

managing allegations and whistle-blowing procedures, to ensure they understand the College's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect, or exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will also undertake annual cyber-security training.

All teachers will have regard to the Teachers' Standards to support the expectation that all teachers will manage behaviour effectively to ensure a positive and safe environment and have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding and child protection updates and training (including online safety) as required through training sessions, emails, briefings, and staff meetings.

All new staff will receive robust safeguarding training in line with the whole college training package. This will be delivered as part of their induction process before they commence working with our students.

Volunteers and Contractors will receive appropriate training, if applicable.

Staff are expected to exercise and develop professional curiosity, recognising that presenting behaviours may mask underlying risk. Staff should respectfully explore concerns, ask appropriate questions, and escalate where something does not feel right.

7.2 The DSL and Deputy DSLs

The DSL and deputies will undertake child protection and safeguarding training at least every two years.

They will also undertake regular and appropriate training to ensure they have the knowledge and skills required to carry out the role effectively, reflecting the breadth of safeguarding responsibilities, including early help, multi-agency working and emerging risks.

Online safety training will be undertaken alongside this and refreshed regularly to keep knowledge of staying safe online and the risks associated up to date. This includes an understanding of filtering and monitoring systems, and cyber security, including emerging technologies.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent Awareness training and remain up to date with any changes to statutory guidance and local safeguarding arrangements.

7.3 Governors

All governors receive safeguarding training (including Prevent and online safety) at induction and are regularly updated to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and receiving assurance that safeguarding policies and procedures are effective and support the College to deliver a robust whole-college approach to safeguarding and reflect current statutory guidance and local safeguarding arrangements.

As the Chair of Governors may be required to act as the 'case manager' if an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

All Governors will undertake training relating to online filtering and monitoring and will receive regular updates to ensure they understand the effectiveness of these systems and their role in providing oversight and, in addition, one Governor will undertake cyber security training to support governance oversight of cyber risk and safeguarding systems.

7.4 Staff who have safeguarding responsibilities

All staff who have regular safeguarding contact with children and their families will attend supervision with the DSL (who has completed safeguarding supervision training with the NSPCC) to provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues and to strengthen professional curiosity, reflective practice and decision making in safeguarding work.

8 Confidentiality

8.1 Please refer to the current [Data Protection Policy](#).

- 8.2
- Timely information sharing is essential to effective safeguarding;
 - Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
 - The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
 - If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
 - Staff should never promise a child they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
 - The government's Information Sharing Advice for Safeguarding Practitioners includes 7 'golden rules' for sharing information, and will support staff who must make decisions about sharing information;
 - If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Deputy) or the Data Protection Officer (Mike Burns);
 - Confidentiality is also addressed in this policy with respect to record-keeping in Section 10;

- Designated Safeguarding Leads are trained to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions; this includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme and demonstrates a clear audit trail of decision-making and information sharing;
- All information sharing decisions will be child-centred, proportionate, and recorded appropriately, in line with statutory guidance and local safeguarding arrangements.

Staff should be clear that consent is not always required to share information to safeguard a child. Where there is a risk of harm, information will be shared lawfully and proportionately, even without consent. All decisions and the rationale for sharing (or not sharing) information will be recorded clearly.

9 Communication with Parents and Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL or a DDSL will normally do this in the event of a suspicion or disclosure and will consider each case on an individual, child-centred basis.

Other staff will only talk to parents about any such concerns following consultation with the DSL and in line with the College's safeguarding procedures.

If we believe notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so and follow their advice on next steps.

In the case of allegations of abuse made against other children, we will usually notify the parents or carers of all the children involved, taking account of the need to safeguard all those affected and avoid compromising any investigation.

We will work with the police and/or the local authority children's social care to make sure our approach to information sharing is consistent and reflects statutory guidance and local safeguarding arrangements.

10 Whole Staff Responsibilities

- 10.1** All staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue:

If a child is suffering or likely to suffer harm, or is in immediate danger:

Make a referral to Dudley Children's 'Front Door' or the Multi Agency Support Team if the child resides in another local authority and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral and should not delay doing so if there is a risk of significant harm. This can be done via the Dudley 'Tell us' page: [Tell us | Dudley Council](#)

See Appendix 3 for more information and contact details for other local authorities.

Tell the DSL or a Deputy DSL as soon as possible if you make a referral directly so they are aware, can provide support, and can ensure appropriate records are maintained and follow-up action is taken.

10.2 If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them and take what they say seriously;
- Allow them time to talk freely and do not ask leading questions or press for additional detail beyond what is necessary;
- Stay calm and do not show you are shocked or upset;
- Tell the child they have done the right thing in telling you; do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on; do not promise to keep it a secret and make clear who you will share the information with and why;
- Write up your conversation via CPOMS as soon as possible and ideally on the same working day in the child's own words; stick to the facts and do not put your own judgement on it;
- If you do not have access to CPOMS, sign and date the write-up and alert the safeguarding team; alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL or a Deputy DSL as soon as possible that you have done so appropriate oversight, support and follow-up action can take place.

Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process and in line with information sharing guidance.

It is also important to understand:

- The child may not feel ready, or know how to tell someone they are being abused, exploited, or neglected;
- They may not recognise their experiences as harmful;
- They may feel embarrassed, humiliated, or threatened; this could be due to their vulnerability, disability, sexual orientation and/or language barriers or fear of consequences.

None of this should stop you from having 'professional curiosity' and speaking to the DSL or a member of the safeguarding team if you have concerns about a child, and staff should always maintain a child-centred approach.

11 Record Keeping

- ### **11.1**
- We will hold records in line with our records retention schedule and data protection requirements;
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and submitted via CPOMS as soon as possible and in line with College procedures; if you are in any doubt about whether to record something, discuss it with a member of the safeguarding team;
- Confidential information and records will be held securely and only available to those who

have a right or professional need to see them and will be managed in accordance with data protection legislation;

- Safeguarding records relating to individual children will be retained for as long as is necessary after they have left the College; this is normally until the child is 25 but some records will be retained for longer periods as outlined in the [Data Protection Act 2018](#) and the College's retention schedule;
- If a child for whom the College has, or has had, safeguarding concerns moves to another institution, the DSL will ensure their safeguarding and child protection file is forwarded promptly and securely and separately from the main student file (within five days of them starting at the new education setting when this information is made available) and confirmation of receipt is obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school or college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child and support continuity of care. If the new education setting uses CPOMS, this request will be made automatically and processed by the DSL and checked to ensure the transfer is complete.

- 11.2** If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Appendix 2 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL or a Deputy DSL first to agree a course of action and ensure appropriate oversight and recording of the concern.

If in exceptional circumstances the DSL or a Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care and take appropriate action, including making a referral where necessary. Referrals should be made by completing a Request for Help and Support Form and returning it to the [Children's Front Door](#)—or contact 0300 555 0050 (option 3).

To refer into Dudley Exploitation hub (DEx), complete a Request for Help and Support Form and return it to the Children's Front Door. For more information, visit [Dudley's Child Exploitation page](#).

Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL or a Deputy DSL as soon as possible so they are aware, can provide support, and can ensure appropriate follow-up action and record-keeping takes place.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL or a Deputy DSL as soon as practically possible and ensure all decisions and actions are recorded appropriately.

12 [Referral](#)

- 12.1** If it is appropriate to refer the case to Local Authority Children’s Social Care or the Police, the DSL or a Deputy DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL or a Deputy DSL as soon as possible so they are aware, can provide support, and can ensure appropriate oversight, follow-up and record-keeping.

The Local Authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. This should be recorded appropriately. The DSL or a Deputy DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded and actions taken are clearly documented. Where there is disagreement with decisions made by other agencies, the College will follow local escalation procedures and challenge appropriately to ensure the child’s needs are met and risks are appropriately addressed.

If the child’s situation does not seem to be improving after the referral, the DSL or a Deputy DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and the child’s situation improves, in line with local safeguarding partnership expectations. Advice and further information on Dudley Professional Resolution can be accessed from the Lead for Safeguarding in Education or directly via the Dudley Safeguarding Partnership website.

If the DSL or a member of the team is unavailable, this should not delay action, and staff should take advice and act in the child’s best interests.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Appendix 2 illustrates the procedure to follow if you have any concerns about a child’s welfare and staff should follow this without delay, maintaining a child-centred approach at all times.

13 Thresholds, Family Help and Early Help

- 13.1** Early Help is acting early and as soon as possible to provide support where problems are emerging for children, young people, and their families to prevent escalation to more significant safeguarding concerns.

If Early Help is appropriate, the DSL or a Deputy DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate and will ensure the child’s needs are clearly identified and support is coordinated effectively. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner where appropriate.

The DSL or a Deputy DSL will keep the case under constant review and ensure interventions are timely, proportionate and regularly evaluated and the College will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed with clear records kept of decisions, actions and outcomes.

[DSPP Continuum of help and support June 2025](#) should be considered when completing a 'Request for Help and Support' form to ensure the level of need is appropriately identified and support is proportionate and timely.

Note, if the concern is at Level 1, no referral is required and support should be provided through universal services, and professionals should contact Dudley's Family Information Service on 01384 814398 to obtain universal information about support available for young people and families and signpost appropriately.

Family Help

Family Help is a form of coordinated, multi-agency support provided when a child and their family have needs which cannot be met by universal services or College-based early help alone. It involves practitioners working together with the family to identify needs, agree outcomes and deliver targeted support.

The College recognises Family Help may be appropriate where concerns are more complex, persistent, or escalate beyond what can be supported through Early Help. In these cases, the DSL or a Deputy DSL will work with partners to refer into Family Help services in line with the local safeguarding partnership arrangements.

The DSL or a Deputy DSL will:

- liaise with relevant agencies and contribute to multi-agency assessments and plans;
- share information appropriately to support effective joint working;
- ensure the child's voice is heard and remains central to any plan;
- monitor the effectiveness of support and review progress regularly;
- escalate concerns where a child's needs are not being met or risks increase.

Staff may be asked to contribute to Family Help assessments or plans and must do so in a timely and proportionate way, sharing relevant information and attending meetings where appropriate.

13.2 View more information on Dudley's [Early Help Strategy](#) and the Department for Education's [Early Help System Guide](#)

14 [When to be concerned](#)

14.1 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 contexts). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation, as well as other forms of harm linked to peer groups, community settings and online environments.

14.2 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not

physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse and may involve multiple perpetrators or contexts. Children may be abused by an adult or adults or by another child or children (child-on-child abuse).

14.3 Signs and Symptoms of Abuse

Abuse, including neglect and exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap and should be considered holistically when assessing risk and need.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone and may involve harm caused through repeated or prolonged exposure to adverse experiences.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another, including exposure to (and thus experiencing) domestic abuse and its impact;
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children, including through online environments.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not.

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing;
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in

sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet) or through other forms of technology;

- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (child-on-child sexual abuse).

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse or other significant risk factors that impact the unborn child.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers);
- Ensure access to appropriate medical care or treatment;
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs and failure to provide appropriate stimulation, affection and support for development.

14.4 Child-on-child abuse is when children abuse other children. This type of abuse can take place inside or outside of college, face to face, online or simultaneously between the two and can involve a range of different behaviours and harms.

Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment. Their wishes, feelings and experiences will be considered when determining how to proceed, while ensuring their safety remains the priority.

We recognise children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" and all concerns will be taken seriously and responded to proportionately and appropriately.

We also recognise the gendered nature of child-on-child abuse, including that it can disproportionately impact girls and be influenced by harmful attitudes and behaviours, and all child-on-child abuse is unacceptable and will be taken seriously and addressed through a whole-college approach to safeguarding.

Child-on-child abuse can include:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse');
- 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);

- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse including harmful behaviour influenced by social media or online content;
- 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 sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Up skirting, 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);

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL or a Deputy DSL, but do not investigate it;
- The DSL or a Deputy DSL will contact the Local Authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL or a Deputy DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed and will regularly review these arrangements;
- The DSL or a Deputy DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate or support access to other appropriate services

Most cases of students hurting other students will be dealt with under our college's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put students in the College at risk;
- Is violent;
- Involves students being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

We will minimise the risk of Child-on-Child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images and addressing harmful attitudes and behaviours promptly;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;

- Ensuring our curriculum helps to educate students about appropriate behaviour and consent and supports them to recognise healthy and respectful relationships;
- Ensuring students know they can talk to staff confidentially through our pastoral system;
- Ensuring staff are trained to understand a student harming a peer could be a sign the child is being abused themselves, and this would fall under the scope of this policy and should be considered in any safeguarding response.

14.5 Consensual and Non-consensual sharing of indecent images

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) 2017 and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident:

If you are made aware of an incident involving consensual and non-consensual sharing of indecent images (also known as ‘youth produced sexual imagery’), you must report it to the DSL or a member of the safeguarding team immediately and follow the College’s safeguarding procedures.

You must not:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL or a Deputy DSL and record the incident appropriately;
- Delete the imagery or ask the student to delete it;
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility) or attempt to investigate the incident yourself;
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers unless directed to do so as part of the safeguarding process;
- Say or do anything to blame or shame any young people involved and maintain a non-judgmental approach at all times.

You should explain you need to report the incident and reassure the student(s) they will receive support and help from the DSL or a Deputy DSL and their safety and wellbeing will be the priority.

14.6 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate college staff as soon as possible. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s) and what immediate safeguarding actions are required;
- If a referral needs to be made to the police and/or children’s social care;
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed);

- What further information is required to decide on the best response;
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- Whether immediate action should be taken to delete or remove images from devices or online services;
- Any relevant facts about the students involved which would influence risk assessment including vulnerability, SEND, and wellbeing factors;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the students involved (in most cases parents should be involved) unless doing so would increase the risk of harm to the child.

The DSL or a Deputy DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult;
- There is reason to believe a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- What the DSL or a Deputy DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any student in the imagery is under 13;
- The DSL or a Deputy DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming) or otherwise demonstrates indicators of significant harm.

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care, ensuring the response remains proportionate, child-centred and clearly recorded.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to ensure risks are fully assessed and managed.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks, ensuring all discussions are proportionate, non-leading, and appropriately recorded.

If at any point in the process there is a concern a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents or carers

The DSL or a Deputy DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe involving them would put the student at risk of harm, in which case advice will be sought from children's social care or the police.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through 101 or 999 in an emergency.

Recording incidents

All sharing of nudes/semi-nude incidents and the decisions made in responding to them will be recorded in detail, including actions taken and the rationale for decisions. Our record-keeping arrangements also apply to recording incidents.

Students will be informed of our procedures on this issue via our pastoral systems.

14.7 Female Genital Mutilation:

If you discover FGM has taken place, or a student is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who discovers (either through disclosure by the victim or visual evidence) an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally via 101 (or 999 in an emergency). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate so appropriate safeguarding action and support can be put in place.

Any other member of staff who discovers an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures without delay.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students or ask leading questions.

Any member of staff who suspects a student is at risk of FGM or suspects FGM has been carried out on any student (including those who are 18 or over) must speak to the DSL and follow our local safeguarding procedures so a risk assessment and appropriate referral can be considered.

The DSL will make sure staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM and understand their responsibilities under this statutory duty.

14.8 Honour Based Abuse (including Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing and may involve cultural, social or family expectations.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators and individuals may be at risk from multiple sources within their community.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it and will respond in a timely and child-centred way. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures and consider the need for immediate referral and protective action.

14.9 Forced Marriage

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used

(see [Implementation of the Marriage and Civil Partnership \(Minimum Age\) Act 2022](#)) and this applies to both legally binding and non-legally binding ceremonies.

Forcing a person into marriage is a crime. A forced marriage is one entered 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 a marriage. Threats can be physical or emotional and psychological and may involve family or community pressure.

Staff will receive training around forced marriage and the presenting symptoms and will be aware of indicators such as withdrawal, extended absence, or sudden changes in behaviour. We are aware of the 'one chance' rule; we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place using a non-judgemental and supportive approach. They will then report this to the DSL without delay.

The DSL will:

- Speak to the student about the concerns in a secure and private place and assess risk in a child-centred way;
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer and/or children's social care as appropriate;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to professionals including counsellors and pastoral support staff to ensure appropriate support is in place.

14.10 Child Criminal Exploitation

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 child into criminal activity, in exchange for something the victim needs or wants, and/or for the

financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. This imbalance of power may be due to age, gender, cognitive ability, physical strength, status or access to resources.

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 and may involve multiple perpetrators or networks.

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 trafficked, forced to work in cannabis factories, modern slavery, coerced into moving drugs or money across the country (county lines), involved in gangs and knife crime, forced to shoplift, or pickpocket, or to threaten other young people or engage in other forms of criminal behaviour for the benefit of others.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Involved in gangs and knife crime;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing college or education;
- Not taking part in education or showing disengagement from usual activities or support networks.

If a member of staff suspects CCE, they will discuss this with the DSL without delay. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate and ensure risks are assessed, recorded and reviewed.

14.11 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. This imbalance of power may be due to age, gender, cognitive ability, physical strength, status or access to resources.

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 and may involve multiple perpetrators or networks.

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

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 or sharing them more widely without consent.

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

- Having an older boyfriend, girlfriend, or partner;
- Suffering from sexually transmitted infections or becoming pregnant or showing sexualised behaviour inappropriate for their age or development.

If a member of staff suspects CSE, they will discuss this with the DSL without delay. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate and ensure risks are assessed, recorded and reviewed.

14.12 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and may indicate other safeguarding concerns or vulnerabilities.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures) and ensure support is coordinated with relevant agencies.

Where a child has been harmed or is at risk of harm, the DSL or a Deputy DSL will also make a referral to children's social care without delay and in line with safeguarding procedures.

14.13 Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members and in wider household relationships. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result or experience ongoing instability and disruption.

Older children may also experience domestic abuse and/or violence in their own personal relationships (intimate partner violence).

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and may also affect their behaviour, wellbeing and ability to engage in education.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in college (usually the designated safeguarding lead) before the child or children arrive at college the following day. West Midlands police forces are part of [Operation Encompass](#).

The DSL will provide support according to the child's needs and update records about their circumstances and ensure appropriate safeguarding actions and support plans are in place and regularly reviewed.

14.14 Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable and will be taken seriously and addressed promptly.

Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports which is child-centred and proportionate.

Ultimately, the College will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required and in line with statutory guidance and local safeguarding arrangements.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college and may impact their attendance, wellbeing and engagement.

If a victim reports an incident, it is essential staff make sure they are reassured they are being taken seriously and they will be supported and kept safe from further harm. A victim should never be given the impression they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims the law on child-on-child abuse is there to protect them, not criminalise them;
- Regularly review decisions and actions, and update policies with lessons learnt and ensure ongoing support meets the child's needs;
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs a child has experienced sexual violence and show sensitivity to their needs and respond in a trauma-informed way.

Some groups are potentially more at risk. Evidence shows girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children are at greater risk and may require additional support or adjustments.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- 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 and undermines a safe college environment.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures within school ensuring the DSL or a Deputy DSL is informed immediately and all concerns are recorded and acted upon without delay.

14.15 Radicalisation and Extremism

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is also defined as the process of a person legitimising support for, or use of, terrorist violence and may occur over time or very quickly.

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

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

Terrorism is an action that:

- Endangers a person's life
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public's health and safety
- Interferes with or seriously 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.

Colleges have a duty to prevent children from being drawn into terrorism. The DSL and the Deputy DSLs will undertake Prevent awareness training and make sure staff have access to appropriate training to equip them to identify children at risk and understand how to respond.

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

We will ensure suitable internet filtering is in place and equip our students to stay safe online at college and at home in line with safeguarding and monitoring responsibilities.

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 and may involve a combination of environmental, social and personal factors.

Staff will be alert to changes in students' behaviour and will exercise professional curiosity when concerns arise.

The Community Safety Officer for Dudley is Mark.Wilson@dudley.gov.uk

The government website [Educate Against Hate](#) and charity [NSPCC](#) say signs a student is being radicalised can include:

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note these signs can also be part of normal teenage behaviour and should be considered in context; staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our reporting procedures including discussing their concerns with the DSL or a Deputy DSL without delay.

Staff should always act if they are worried and ensure concerns are recorded appropriately.

Further information on the College's measures to prevent radicalisation are set out in other college policies and procedures, including:

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or a Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral so oversight, support and follow-up action can take place.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the local authority children's social care team or to [Prevent](#) ensuring decisions are proportionate and child-centred.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which college staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group;
- See or hear something that may be terrorist related.

Staff will also receive training and have due regard to the [Prevent Duty Guidance 2023](#) and any subsequent updates.

14.16 Mental Health: if you have a mental health concern about a student

Mental health problems can, in some cases, be an indicator a child has suffered or is at risk of suffering abuse, neglect or exploitation and should be considered within the wider safeguarding context.

The Senior Designated Mental Health Lead is Sarah MacKenzie (Assistant Principal), and her deputy is Mark Brown (Lead Counsellor) who support the College's approach to promoting positive mental health and responding to concerns.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one and will respond with sensitivity, professional curiosity and a child-centred approach.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and follow safeguarding procedures, including informing the DSL or a Deputy DSL without delay.

If you have a mental health concern that is not also a safeguarding concern, report this to the student's Personal or Lead Tutor; they will speak to the DSL or a Deputy DSL if necessary to agree a course of action and ensure appropriate support is put in place and monitored.

15 LGBTQI+ Students

- 15.1** Some students may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, biphobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide, or homelessness and other safeguarding vulnerabilities.

Several studies also evidence that LGBTQI+ young people may be at increased risk of becoming victims of CSE and other forms of exploitation and abuse.

The College is aware of these increased risk factors and knows how to access appropriate support for these young people when required and will respond to concerns in a timely, proportionate and child-centred way.

Children who are questioning their gender may require additional and sensitive support. The College recognises this may present safeguarding considerations and responses should be carefully considered, individualised and based on the best interests of the child.

In line with statutory guidance, the College will:

- take a child-centred approach, while recognising decisions may not always align with the child's expressed wishes;
- involve parents or carers as the default, unless this would place the child at risk of harm, in which case the DSL will determine appropriate action;
- ensure the Designated Safeguarding Lead (or a Deputy) is involved in decision-making where there are safeguarding considerations;
- ensure decisions are made through a clear, structured and recorded process;
- work with relevant professionals and agencies where appropriate to support the child's wellbeing and safety.

The College will ensure all students are treated with dignity and respect, and staff challenge any discriminatory behaviour or bullying. At the same time, staff will remain focused on safeguarding responsibilities and the welfare of all students.

16 Online Safety and the use of Mobile Technology

- 16.1** The College is aware of and implements the Government guidance on [Searching, screening and confiscation in schools](#) and [Teaching online safety in schools](#)

Staff receive online safety training at induction and regular updates including:

- Safe internet use;
- Online safeguarding issues including cyber-bullying and online radicalisation;
- The expectations, roles and responsibilities around filtering and monitoring and how concerns are identified, reported, and acted on.

All staff will receive refresher training as required and at least once each academic year to ensure knowledge remains current and reflects emerging risks.

Staff are also aware of restrictions placed on them with regards to the use of mobile phones and cameras (see our [Photography and Filming Policy](#)). Staff are allowed to bring personal phones to college for their own use but will limit such use to non-contact time when students are not present and in line with staff conduct and safeguarding expectations.

Staff must not communicate with students via personal devices or personal social media accounts and must only use College-approved communication systems. This ensures appropriate professional boundaries are maintained at all times.

Students are taught about safeguarding and being safe online through the tutorial programme, including:

- how to report concerns, including cyber-bullying where they are the victim or a witness;
- the safe use of social media, the internet and technology;
- keeping personal information private;
- how to recognize unacceptable online behaviour and respond appropriately.

Parents/carers are educated about online safety via our website and communications sent directly to them. We also share safeguarding procedures with them, so they know how to raise concerns about online safety. They are made aware staff can search students' phones as set out in the Depart for Education's guidance (above).

The College has web filtering and monitoring in place to protect students through the Wi-Fi network and activity is continuously monitored and reported on with clear processes in place to review alerts and take timely safeguarding action. This limits their exposure to the four main categories of risk:

Content – being exposed to illegal, inappropriate, or harmful content, such as 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.

This also enables us to identify any students at risk who are then followed up and provided with support as necessary through a coordinated safeguarding response.

Staff and students are signposted to and understand our [Computer Misuse Policy](#)

which includes the sanctions we will use if they are in breach of it.

Use of Artificial Intelligence (AI) in Safeguarding

The college recognises the growing role of Artificial Intelligence (AI) in education and administration. While AI can enhance learning and streamline operations, its use must align with our safeguarding principles to ensure the safety and wellbeing of all students and to mitigate emerging risks associated with new technologies.

Ethical Use - AI tools must be used ethically and responsibly. Staff and students are expected to use AI in ways that support learning and personal development, without compromising privacy, dignity, or safety or contributing to harm.

Data Protection -any AI system that processes personal data must comply with data protection laws. Staff must ensure student data is not shared with AI platforms without appropriate safeguards and authorization.

Monitoring and Oversight - the College will monitor the use of AI tools to prevent misuse, including the generation of harmful, discriminatory, or inappropriate content and respond to any concerns through safeguarding procedures.

Education and Awareness - students will be educated on the safe and responsible use of AI, including understanding its limitations, potential biases, and the importance of critical thinking and digital resilience.

Filtering and Monitoring – the College will refer to [Generative AI: product safety expectations](#) to ensure AI products and systems are considered safe for users in educational settings and align with filtering and monitoring standards.

Reporting Concerns - any concerns about the misuse of AI, including the creation or sharing of harmful content, must be reported to the Designated Safeguarding Lead (DSL) or a DDSL immediately and recorded via CPOMS so risks can be assessed and appropriate action taken.

The College has clearly defined roles and responsibilities in relation to filtering and monitoring systems. This includes strategic oversight by leaders and governors, operational management by IT staff, and safeguarding oversight by the Designated Safeguarding Lead. These roles are reviewed regularly to ensure systems remain effective.

17 Virtual Lessons and Contact

17.1 We are committed to providing a safe and secure learning environment for all our students, including within virtual and online learning spaces. We recognise that safeguarding applies equally in digital environments and must reflect emerging risks associated with technology, including online harm, exploitation, and AI-enabled abuse.

We also recognise the importance of ensuring children are safe, respected, and supported during all forms of education, including remote or virtual delivery.

Child-Centred Approach - we always prioritize the best interests of the child, ensuring their safety, welfare, and educational needs are paramount and safeguarding practice remains child-centred, with early identification of risk and timely intervention.

Equal Treatment - we treat all children equally and without discrimination, regardless of their age, gender, race, ethnicity, religion, disability, or any other protected characteristic. We recognise some children may be at greater risk of harm online and will take additional steps to support vulnerable groups.

Inclusivity - we aim to create an inclusive, respectful, and supportive learning environment where all children feel valued and can participate fully. This includes recognising intersecting vulnerabilities including mental health needs, online exploitation risks and contextual safeguarding factors, and responding in a trauma-informed and proportionate manner.

Transparency - we are transparent in our actions and communications, ensuring students and parents/carers are informed about nature, expectations and safeguards associated with virtual learning and will communicate concerns appropriately, collaborating with parents/carers and external agencies where necessary to safeguard and promote the welfare of children.

Safe Use of Technology and Online Environments - we recognise online safety is a key safeguarding priority. We will ensure appropriate filtering and monitoring systems are in place, staff are trained to identify and respond to online risks, and students are supported to develop digital resilience. This includes awareness of emerging risks such as AI-generated harm, online exploitation, and non-consensual sharing of images.

17.2 Staff

Training - all staff involved in virtual lessons undergo training on child protection and receive guidance on best practice for online safety; all staff will be expected to understand their safeguarding responsibilities, read and understand Part 1 of KCSiE, and be able to identify early signs of harm (including online and technology-facilitated abuse). Training will be regularly updated to reflect emerging risks, including AI-enabled harm and online exploitation.

Supervision - staff must maintain appropriate supervision of virtual lessons to ensure safe and appropriate conduct and behaviour. They should remain vigilant to any signs of distress, harm, or discomfort among students. This includes recognising indicators of safeguarding concerns in an online context (e.g. sudden disengagement, inappropriate online interactions, or signs of coercion) and responding in line with the setting's safeguarding procedures. Staff should maintain professional boundaries and follow agreed protocols for safe online teaching.

Reporting – any concerns or suspicions of abuse, neglect or harm must be reported promptly in line with the setting's safeguarding procedures. All staff are responsible for acting on concerns immediately, understanding safeguarding is a shared responsibility, and early reporting supports timely intervention. Concerns must be reported to the Designated Safeguarding Lead (DSL) without delay, and staff should not assume someone else will take

action. Where appropriate, concerns will be shared with external agencies in line with statutory guidance.

Professional Confidence and Safeguarding Culture - staff are expected to contribute to a strong safeguarding culture by being professionally curious, confident to raise concerns, and proactive in identifying emerging risks.

17.3 Parents/Carers

Communication –Parents/carers are encouraged to communicate any concerns about their child’s safety or online experiences with the school/college without delay. We recognise the importance of effective information sharing and partnership working with parents/carers to support early identification of risk and timely safeguarding intervention and will respond to concerns in a supportive and proportionate manner, in line with safeguarding procedures.

Privacy and Online Safety- parents/carers are encouraged to support their child’s understanding of online privacy and safe use of technology. We will provide accessible and up-to-date information, guidance and signposting on online safety, including emerging risks such as online exploitation, harmful content, and AI-enabled harm. This will be shared via our website and wider communications to support parents/carers in promoting safe home use of technology.

Working in Partnership - we will work collaboratively with parents/carers as part of our wider safeguarding responsibilities, recognising online safety promoting the welfare of children online is a shared responsibility. Where appropriate, and unless doing so would place a child at increased risk of harm, parents/carers will be involved in online safeguarding decisions and support plans.

17.4 Students

Respectful Behaviour - students are expected to behave respectfully towards staff and peers during virtual lessons; this includes understanding behaviour online is subject to the same expectations as in person, including conduct related to child-on-child abuse, harassment, and the misuse of technology (including sharing images or using AI inappropriately). Students will be supported to understand acceptable behaviour and the impact their actions may have on others.

Reporting - students should feel safe and supported to report any concerns, worries or inappropriate conduct to a trusted adult; we recognise the importance of student voice and students will be actively encouraged to share concerns, knowing they will be taken seriously and acted upon. This includes concerns relating to online safety, peer behaviour, or experiences both in and outside the virtual learning environment, and staff will respond in a supportive, proportionate and timely manner.

Understanding Risk and Seeking Help - students will be supported through the curriculum and pastoral systems to understand online risks, including exploitation, harmful content, and technology-facilitated abuse. They will be encouraged to seek help early and to support their peers to do the same where appropriate.

17.5 Online Safety Measures

Secure Platforms: we use secure and trusted online platforms for virtual lessons to ensure a safe digital environment. We will assess the safeguarding risks associated with all platforms used and ensure they are appropriate for educational use, including consideration of emerging risks linked to online interaction and technology-facilitated harm.

Privacy Settings

Privacy Settings - all virtual lessons will be conducted using appropriate privacy settings to protect the identity, personal data, and online safety of our students. This includes ensuring access to sessions is controlled, recording functions are used appropriately, and personal information is not unnecessarily shared, in line with safeguarding and data protection principles.

Access Control - only registered students and authorized personnel will have access to virtual lessons. We will ensure clear authentication processes are in place and access is appropriately restricted and monitored to prevent unauthorised entry or misuse.

Filtering and Monitoring - we will ensure appropriate filtering and monitoring systems are in place to safeguard students from harmful online content and identify potential safeguarding concerns. These systems will be regularly reviewed to ensure they remain effective and proportionate.

Responding to Online Safety Concerns - any concerns identified through online platforms, including inappropriate content, behaviour or interactions, will be managed in line with our safeguarding procedures, including reporting to the DSL and, where appropriate, referral to external agencies.

17.6 Communication

Clear, open and effective communication is essential to ensure the safety and wellbeing of students during virtual lessons.

We will:

- Provide parents/carers with information about the virtual lessons, including expectations, safeguarding arrangements and how to raise concerns;
- Maintain open channels of communication between staff, parents/carers, and students for reporting concerns, sharing information, or seeking advice and guidance.

17.7 Incident Response

In the event of an incident or concern, we will:

- Take immediate action to ensure the safety and well-being of the child involved;
- Follow established safeguarding procedures for reporting and responding to child protection concerns, including prompt referral to the Designated Safeguarding Lead (DSL) and appropriate escalation where required;

- Work in partnership with relevant agencies (including children's social care, police and other services) where a child may be at risk of harm, in line with statutory guidance on multi-agency safeguarding;
- Maintain accurate and secure records of all concerns, actions taken, decisions made, and outcomes, in line with safeguarding and information-sharing requirements.

18 Children who are absent from college/education

18.1 School leavers still must do one of the following until they turn 18:

- Stay in full-time education;
- Start an apprenticeship or traineeship;
- Spend 20 hours or more a week working or volunteering alongside part-time education.

A child being absent from college/education, particularly repeatedly, can be a warning sign of a range of safeguarding issues so should always be considered within a safeguarding context.

It may also indicate unmet needs requiring early help or statutory intervention including:

- Abuse or neglect;
- Sexual abuse or exploitation;
- Child criminal exploitation;
- Mental health problems;
- Substance use;
- Radicalisation;
- Female Genital Mutilation;
- Forced marriage.

Persistent absence will always be considered within a safeguarding context.

Children at Greater Risk - there are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Cease to attend college;
- Come from new migrant families.

We also recognise vulnerability may be contextual and cumulative and will consider each child's individual circumstances when assessing risk.

College Response to Absence - we will follow our procedures for unexplained and repeated absence and for dealing with students who are absent from college/education, particularly

on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation. This includes:

- Liaising with parents/carers to establish reasons for absence;
- Actively exploring whether absence may be linked to safeguarding concerns, including online harms or exploitation;
- Informing Connexions (or equivalent services) where appropriate if a student leaves education;
- Offering careers information, advice and guidance to support progression into education, employment or training.

We will follow our procedures for managing unexplained and repeated absence to help identify and respond to safeguarding concerns at the earliest opportunity. This will include:

Targeted Support for Vulnerable Students - students identified as vulnerable will be placed on an absence alert or monitoring list to ensure timely follow-up. We will take proactive steps to establish contact and confirm the student's safety, recognising children missing education may be at increased risk of harm.

Staff will be trained to recognise indicators and triggers for safeguarding concerns linked to absence, including:

- Exploitation (including criminal or sexual exploitation);
- Radicalisation;
- FGM and forced marriage;
- Serious violence or involvement in harmful groups;
- Emerging risks, including those linked to online activity or technology-facilitated harm.

Safeguarding Referrals and Escalation – if a staff member suspects a child is suffering or likely to suffer harm, we will follow local safeguarding procedures, including making reasonable enquiries and make an immediate referral to children's social care and/or the police where appropriate, particularly where:

- A child is suffering or likely to suffer significant harm; or
- A child is in immediate danger.

All actions will be recorded and managed in line with safeguarding and information-sharing requirements, and we will work with relevant agencies to safeguard and promote the welfare of the child.

19 Designated Teacher for Children Looked After and Previously Children Looked After

The Principal (Holly Bembridge) holds responsibility for promoting the educational achievement of Children Looked-After and Previously Children Looked-After in line with [Statutory Guidance](#). This work is supported by our **Faculty Directors** and **Lead Tutors/DDSs**, who help ensure students receive appropriate academic, pastoral and safeguarding support.

We recognise children who are looked after, previously looked after, or who have (or have had) a social worker are at increased risk of harm and require a particularly proactive and coordinated safeguarding response.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure any safeguarding concerns regarding Children Looked-After and Children Previously Looked-After are quickly and effectively responded to;
- Work with external agencies to promote the educational achievement of Children Looked-After and Children Previously Looked-After, including discussing how bursary and free college meals funding can be best used to support them and meet the needs identified in their Personal Education Plans (PEPs);
- Promote a culture of high expectations and provide additional support where needed, recognising the impact of trauma, loss and instability on learning and wellbeing;
- Ensure the voice of the child is understood and reflected in decision-making, in line with child-centred safeguarding principles.

We will ensure staff have the skills, knowledge and understanding to keep Children Looked-After, Children Previously Looked-After, and children with a social worker safe. We will ensure:

- Appropriate staff have relevant information about their looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- The DSL has details of children's social workers and Virtual School Heads (where applicable);
- Information is shared appropriately and proportionately, in line with safeguarding and data protection principles, to ensure children receive the right support at the right time;
- Staff understand these children may require early help or statutory intervention and information sharing is critical to effective safeguarding.

20 **Students with a Social Worker**

Students may need a social worker due to safeguarding or welfare needs. We recognise a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

We recognise children with a social worker (current or historic) are at increased risk of harm and require a proactive, coordinated safeguarding response, including early identification and support.

The Designated Safeguarding Lead (DSL) and all members of staff will work closely with and support social workers and other professionals to help protect vulnerable children. This includes effective information sharing, participation in multi-agency processes, and contributing to assessments and plans to safeguard and promote the welfare of the child.

Where we are aware a student has a social worker, the DSL will always take this into account to ensure any decisions are made in the best interests of the student's safety, welfare, and educational outcomes. For example, this will inform decisions about:

- Responding to unexplained absences where there are known safeguarding risks;
- The provision of pastoral and/or academic support;
- The need for early help or escalation to statutory intervention;
- Understanding the wider context of the child's lived experience (including risks outside the home).

Students living in a Kinship Care Arrangement

Kinship care involves a student being looked after by relatives or close family friends due to parental absence. These arrangements may be formal or informal and can present unique safeguarding challenges.

We recognise children in kinship care may share similar vulnerabilities to Children Looked-After and those with a social worker, including disrupted attachments, trauma, and increased safeguarding risk.

Students in kinship care may be more vulnerable to emotional distress, instability, or neglect. Any concerns must be reported to the Designated Safeguarding Lead (DSL), who will coordinate support and liaise with external agencies as needed including children's social care, Virtual School Heads, and other relevant services where appropriate.

The College will ensure kinship carers are included in relevant communications and students receive appropriate pastoral and academic support.

We will take a child-centred and trauma-informed approach, ensuring the voice of the child is heard and support is tailored to individual need.

Staff training will include awareness of kinship care and its safeguarding implications. Staff will be supported to understand the potential indicators of vulnerability and how to respond appropriately, including recognising when concerns may require early help or safeguarding referral.

21 Children with Special Educational Needs and Disabilities

We recognise students with special educational needs (SEND) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Students being more prone to peer group isolation than other students;
- The potential for students with SEND and disabilities being disproportionately impacted by behaviours such as bullying, harassment or exploitation, without outwardly showing any signs;
- Communication barriers and difficulties in understanding or expressing concerns;
- This includes students who may be unable to communicate verbally or who require additional support to disclose concerns.

We recognise the importance of taking a child-centred and trauma-informed approach, ensuring the voice of the child is heard and barriers to communication are actively addressed.

We offer additional pastoral support for students with SEND and disabilities. This includes:

- An experienced Personal Tutor;
- Support from an Inclusion Coordinator;
- Access to the Retreat (a smaller, safe study space within college).

We will ensure reasonable adjustments are made to support students with SEND to access safeguarding support, report concerns, and participate safely in both face-to-face and online learning environments.

Our SENCo, Lowri Saenger, is also a Deputy Designated Safeguarding Lead (DDSL) which supports effective information sharing, joined-up working and timely safeguarding responses

We will ensure all staff are trained to recognise and respond to safeguarding concerns in students with SEND, including understanding how abuse, neglect or exploitation may present differently. Staff will be supported to:

- Be professionally curious and avoid making assumptions;
- Recognise indicators of child-on-child abuse, discrimination or exploitation affecting SEND students;
- Respond in a timely and appropriate manner in line with safeguarding procedures;
- Understand students with SEND may require additional support to disclose concerns and early identification is critical.

22 **Safeguarding in the Curriculum**

All classroom-based and student-facing staff receive appropriate safeguarding training, including preventative safeguarding, trauma-informed practice, and creating a safe learning environment where positive mental health and wellbeing are promoted. All staff understand safeguarding is a whole-setting responsibility and are equipped to identify early signs of harm, respond appropriately, and promote a culture of safety within the classroom.

Safeguarding is embedded within the tutorial curriculum and is further reinforced through assemblies and other enrichment activities to reflect KCSiE (2026) expectations that schools and colleges provide opportunities to teach safeguarding, enabling students to recognise risk, build resilience and understand how to seek help.

In keeping with the ethos of this policy and its protective measures, teaching staff and the Principal, as Head of Centre, will ensure performances, coursework and assessed content are appropriate for the college setting and the 16–19 age group.

All content and themes will be carefully considered in the context of the College's safeguarding duties, including:

- The potential impact on students' wellbeing, particularly those who may have experienced trauma or vulnerability;
- The risk of exposing students to harmful, distressing or inappropriate material;
- The need to maintain a safe, respectful and inclusive learning environment;
- The safeguarding implications of themes such as violence, abuse, exploitation or discrimination.

Staff will exercise professional judgement and seek guidance from safeguarding leads where there is any uncertainty about the suitability of content, ensuring safeguarding and student wellbeing remain paramount.

23 Allegations against Staff

- 23.1** Clear boundaries and professional standards are essential to safeguarding and promoting the welfare of children. Therefore, all staff are expected to be aware of and adhere to the Staff Code of Conduct, which includes guidance on appropriate professional behaviour, safe working practices, and the use of mobile phones and technology.

Further information is available via our [Managing Allegations](#) Trust policy.

- 23.2** We recognise a student may make an allegation against a member of staff. In these cases, we will follow statutory guidance as set out in *Keeping Children Safe in Education* and local procedures (including DPSS arrangements) for managing allegations against staff. This includes distinguishing between concerns that meet the harm threshold and those that do not (often referred to as 'low-level concerns'), ensuring all concerns are taken seriously, recorded appropriately, and responded to in line with statutory guidance.

All allegations and concerns about adults working with children will be:

- Reported promptly to the Head of Centre (Principal) and/or DSL, as appropriate;
- Referred to the Local Authority Designated Officer (LADO) where the harm threshold may be met;
- Managed in accordance with local safeguarding partnership procedures and statutory guidance;
- Handled with due regard to confidentiality, fairness and the welfare of both the child and the member of staff.

We recognise the importance of a strong safeguarding culture in which staff feel able to raise concerns about the behaviour of colleagues, including low-level concerns, without fear of reprisal.

Staff are encouraged to raise any concerns about poor or unsafe practice through the refer Trust [Whistleblowing Policy](#) which ensures concerns can be raised safely and appropriately, supporting transparency, accountability and early intervention.

Staff may also raise concerns directly with the NSPCC whistleblowing advice line (0800 028 0285) if they feel unable to do so internally. This provides an independent route for safeguarding concerns to be raised.

- 23.3** If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made that a member of staff may pose a risk of harm to children, you must report this immediately to the Principal.

The Principal will discuss the allegation with the Local Authority Designated Officer (LADO) in accordance with statutory guidance and local safeguarding procedures:

- Yvonne Nelson-Brown - 01384 813110/Yvonne.Nelson-Brown@dudley.gov.uk
- Sukhchandan Kaur - 01384 813066 /Sukhchandan.Kaur@dudley.gov.uk,
- General line: 01384 813061

- Email Allegations@dudley.gov.uk

This process applies where a member of staff (including supply teachers and volunteers) has:

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

If the concern or allegation relates to the Principal, it must be reported to the Chair of Governors (Jules Singh).

The College will work with the LADO and other relevant agencies to investigate and manage allegations in line with statutory guidance.

All cases will be managed promptly, fairly and consistently, with the safety and welfare of the child as the paramount consideration.

In line with KCSiE 2026, we recognise the importance of distinguishing between allegations that meet the harm threshold and those that do not (low-level concerns). All concerns about adults working with children will be:

- Taken seriously and acted upon promptly;
- Recorded clearly and accurately;
- Managed in accordance with safeguarding procedures and professional standards;
- Shared with appropriate parties on a need-to-know basis.

We recognise the importance of maintaining a strong safeguarding culture in which staff feel confident to raise concerns about colleagues' behaviour at an early stage, including low-level concerns, to prevent escalation and ensure children remain safe.

24 Staff concerns that do not meet the harm threshold/Low Level Concerns

24.1 Staff concerns that do not meet the harm threshold (often referred to as *low-level concerns*) relate to any behaviour by an adult working in or on behalf of the College that may be inappropriate but does not meet the criteria for referral to the Local Authority Designated Officer (LADO).

A low-level concern may include any concern – no matter how small – that an adult has:

- Acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and/or
- Not met the harm threshold or is not considered serious enough to trigger a referral to the LADO.

We recognise the importance of identifying, recording and responding to low-level concerns at an early stage to help create and maintain a strong safeguarding culture and to prevent escalation.

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

- Being over-friendly with students;
- Showing favouritism towards particular students;
- Taking images of students on a personal mobile phone, contrary to College policy;
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door without appropriate safeguards;
- Humiliating or belittling students.

Low-level concerns will be:

- Shared with the Principal (or Head of Centre) promptly;
- Recorded clearly and accurately;
- Reviewed to identify patterns of behaviour or emerging risk;
- Addressed proportionately, in line with the Staff Code of Conduct and safeguarding procedures.

We recognise all staff play a crucial role in maintaining a safe environment and are expected to raise concerns about colleagues' behaviour, however small, to protect students and uphold professional standards.

24.2 We recognise the importance of creating a culture of openness, trust and transparency. All staff are encouraged to share low-level concerns so they can be addressed appropriately and at an early stage. We understand a strong safeguarding culture depends on staff feeling confident to raise concerns, knowing they will be taken seriously and acted upon proportionately.

We will create and maintain this culture by:

- Ensuring staff are clear about what appropriate behaviour looks like and are confident in distinguishing this from concerning, problematic or inappropriate behaviour (in themselves and others);
- Empowering staff to share low-level concerns and self-refer where appropriate, recognising early reporting is essential to effective safeguarding;
- Addressing unprofessional behaviour promptly and supporting individuals to reflect and improve practice at an early stage, to prevent escalation and reduce risk to students;
- Providing a responsive, sensitive and proportionate approach to handling concerns, ensuring fairness, consistency and support for all involved;
- Helping to identify patterns of behaviour and any weaknesses in the College's safeguarding systems, including reviewing concerns to strengthen practice and improve safeguarding outcomes;
- Promoting professional curiosity, reflection and accountability, ensuring safeguarding remains an active and shared responsibility across the College.

24.3 Where a concern is raised by a third party, the Principal (or a nominated deputy) will gather as much relevant information as possible to inform next steps. This will include:

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

Concerns will be approached with an open and enquiring mindset, ensuring all information is considered fairly, objectively and without pre-judgement.

The Principal will use the information to categorise the type of behaviour and determine any further action, in line with the College's code of conduct.

- 24.4** All staff concerns that do not meet the harm threshold/low-level concerns will be recorded in writing. In addition to details of the concern, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR;
- Reviewed so potential patterns of concerning, problematic, or inappropriate behaviour can be identified;
- Used to inform decision-making about further action, including:
 - Proportionate management through internal procedures; or
 - Escalation where concerns meet the harm threshold, including referral to the LADO;
- Where a pattern is identified, we will decide on a course of action through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer to the LADO;
- Retained at least until the individual leaves employment at the College.

Where appropriate, records may be retained longer in line with safeguarding, HR and statutory guidance to support safer recruitment and ongoing safeguarding considerations.

25 Visitors

- 25.1** All visitors will be required to verify their identity to the satisfaction of staff. If a visitor is unknown to the setting, we will check their credentials and the purpose of their visit before allowing them to enter the College. Visitors must:

- Produce appropriate identification;
- Sign in on arrival;
- Always wear a visitor badge while on site.

Further information is available in the College's [Visitors Policy](#).

These arrangements support a safe environment by ensuring all adults on site are appropriately identified, supervised and authorised, in line with safeguarding expectations.

All other visitors, including visiting speakers, will be always accompanied by a member of staff. This ensures appropriate supervision and reduces the risk of harm or inappropriate interaction with students.

- 25.2** We will not invite any speaker into the College who is known to disseminate extremist views. In line with our safeguarding duties, including the Prevent duty, we will carry out appropriate checks and risk assessments to ensure any individual or organisation using College facilities is suitable and does not seek to:

- Promote extremist views;

- Encourage radicalisation; or
- Expose students to harmful or inappropriate content.

We will ensure visiting speakers are suitable, content is appropriate for the 16–19 age group, and any risks are identified and managed in advance. Any concerns arising from a visit will be reported in line with safeguarding procedures

26 [Raising a Concern](#)

26.1 We strive to achieve high standards in the discharge of our safeguarding responsibilities and welcome feedback on all aspects of our practice. We recognise feedback is essential in maintaining an effective safeguarding culture, supporting continuous improvement and helping to minimise the likelihood of concerns recurring.

Where a concern does arise, we will treat the matter seriously, transparently and in a way that is fair to all parties; concerns will be addressed promptly, proportionately and with the safety and welfare of the child as the paramount consideration.

We will:

- Reflect on concerns and outcomes to identify learning and areas for improvement;
- Use feedback to strengthen safeguarding systems, policies and practice;
- Promote a culture of openness where concerns can be raised and addressed without fear;
- Ensure all actions are handled sensitively, fairly and consistently, with appropriate support for those involved.

Our [Complaints and Concerns Policy](#) is available on our website.

Date of review	Date agreed	JCC	Governors	Review date	Comments
June 2026 for September 2026	June 2026	21/05/26	LGB 10 June 2026	September 2026	Slight update April 2026 and Sept 2026

[Appendix 1](#)

LADO PROCESS FLOWCHART – ALLEGATIONS/CONCERNS AGAINST STAFF IN PAID OR VOLUNTARY POSITION

It is your duty to IMMEDIATELY report concerns to your Designated Safeguarding Lead (DSL)/Manager. If you feel that your concern has not been dealt with appropriately you have a duty to report your concern directly.

As defined by Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2026) - an allegation has been made whereby a person working (employed or volunteer) with children may have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

If an allegation is made against any adult who comes into contact with children in either a paid or unpaid capacity, the DSL/Manager/Employer MUST contact the Designated Officer (LADO) within 1 (one) working day.

For Early Years/Childcare providers please contact:

For Yvonne Nelson-Brown – 01384 813110
For Sukhchandan Kaur – 01384 813066
General line: 01384 813061
allegations@dudley.gov.uk
AND Ofsted 0300 123 1231

For Any other professional organisations please contact:

For Yvonne Nelson-Brown – 01384 813110
For Sukhchandan Kaur – 01384 813066
General line: 01384 813061
allegations@dudley.gov.uk

Step 1: Contact LADO discussion to take place regarding initial planning and whether the member of staff/person concerned is to be informed of the allegation; the LADO will ask you to complete a referral form.

Step 2: For Allegations/concerns/ongoing risk to a child you must also make a referral to Dudley Front Door Service (MASH) Portal Link
<https://childrensocialcare.dudley.gov.uk/web/portal/pages/home> or call 0300 555 0050.

(MASH hours are 9am–5pm Monday to Friday or out of hours contact the Emergency Duty Team – 0300 555 8574)

A Position of Trust (PoT) meeting may be convened to consider the allegation and plan any further enquiries/investigation – this is a multi-agency meeting which will include attendance from your agency and may include the Police, Childrens Social Care and Ofsted.

The LADO chairs pot meetings to exchange information and to decide on a formal investigation process.

(There are occasions when investigations are in process before a PoT is convened these are usually when the allegation has been made directly to the Police.)

a) Following the LADO referral, if an allegation is false or unfounded.

There is NO Social Care or Police investigation.

There is no further action but refer to LA children's Social Care or Police if allegation is deliberately invented.

b) If an allegation is founded and possible disciplinary procedures or potential criminal proceedings.

There is involvement with Social Care and/or a Police investigation. A S47/Strategy discussion between Social Care & Police is held to consider appropriate response, e.g. whether single or multi agency meeting is necessary.

It is the employer's responsibility to share info to all professionals involved.

If a child has suffered, or is likely to suffer significant harm.

LADO discuss with Children's Social Care the need for a PoT meeting.

You decide upon action to safeguarding children and young people within your establishment. i.e. staff suspension, restricted duties, etc.

No significant harm but allegation might constitute a criminal offence.

LADO to discuss with Police for an initial evaluation.

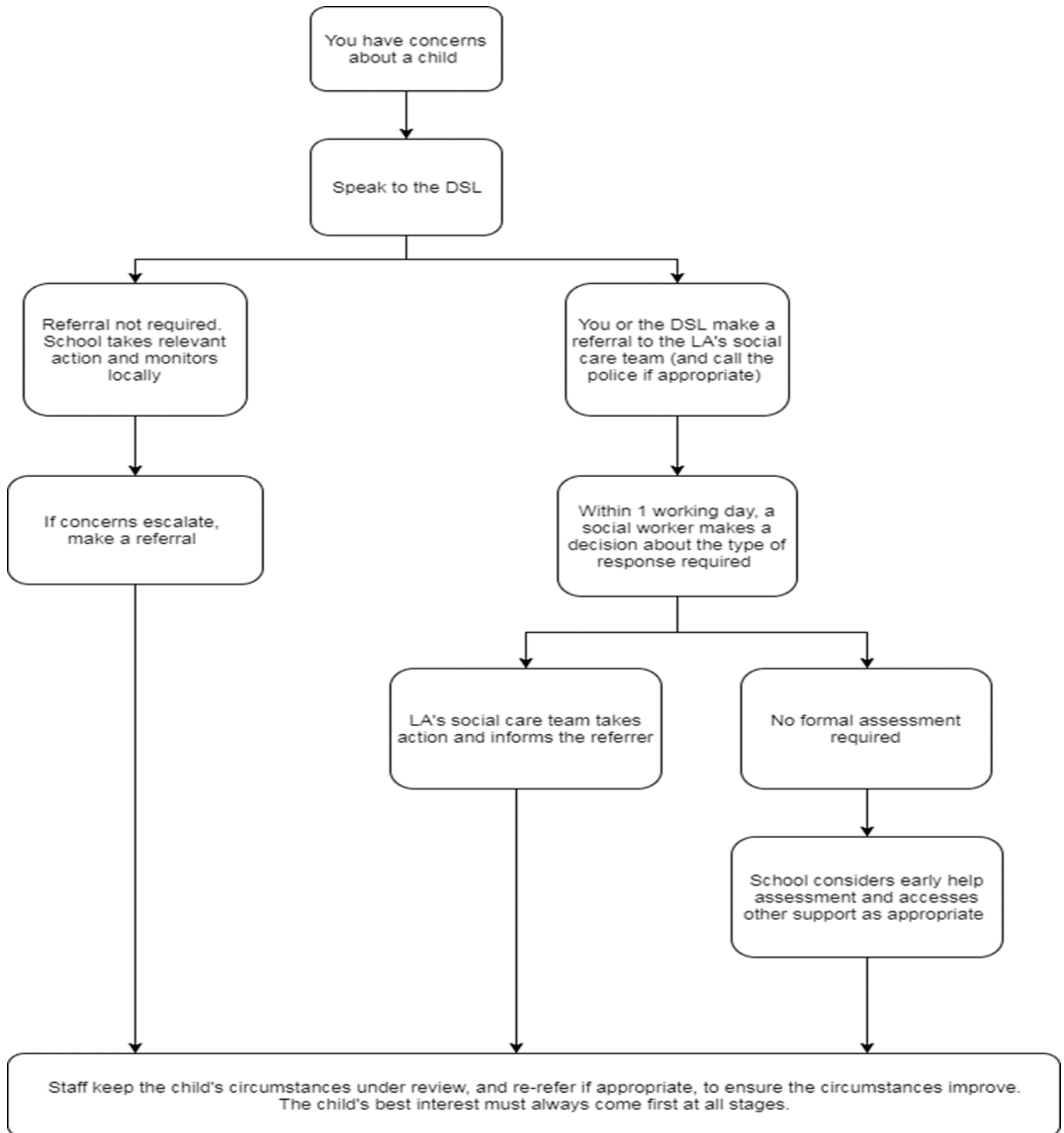
If the allegation is SUBSTANTIATED. It is the employers responsibility make a referral to DBS service and/or to other regulation bodies, e.g. TRA, SWE, Sports Associations, etc. informing them of the outcome of the allegation.

If you are an Early Years/Childminder setting you must contact Ofsted. They will decide on any action i.e. withdraw registration and will liaise on the referral to the DBS – 01325 953795.

REMEMBER.....
Is the child safe?

Make sure to document everything. Do not investigate.
If in doubt seek advice from LADO

Reviewed September 2024 by YNB



Making a Referral to Childs Services: Information for all staff

If a serious safeguarding or child protection situation occurs where it is not possible to contact a safeguarding lead please follow the steps below and then contact the DSL or a Deputy as soon as possible.

If a child is at imminent/significant risk of harm/immediate danger you should **call 911** in the first instance (for police and/or ambulance).

Anyone can make a referral to child services. It is important that you determine where the student lives, so you can contact the appropriate organisation. It is useful if you can also provide the following:

- Full name of student
- Date of birth
- Address
- Telephone numbers of parents/carers and student
- Names and dates of birth of any siblings and the school they attend to (if appropriate)

Contacts Details

Dudley

Telephone: 0300 555 0050

Emergency Out-of-Hours: 0300 555 8574

Sandwell

Telephone: 0121 569 3100 (out of office hours is the same number)

Birmingham

Telephone: 0121 303 1888

Emergency Out-of-Hours: 0121 675 4806

Wolverhampton

Telephone: 01902 555392

Emergency Out-of-Hours: 01902 552999

Shropshire

Telephone: 0345 678 9021

Emergency Out-of-Hours: 0345 6789040

Staffordshire

Telephone: 0300 111 8007

Emergency Out-of-Hours: 0345 604 2886

Worcestershire

Telephone: 01905 822666

Emergency Out-of-Hours: 01905 768020

If you are concerned about a child who does not attend this college, you can contact the NSPCC via help@nspcc.org.uk or 0808 800 5000