Safeguarding and PREVENT Policy

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1 About the policy

1.1 Policy purpose

1.1.1 To inform staff, students, parents/carers and all other service users of the policy and procedures Telford College and Telford and Wrekin Local authority have in place to ensure that the welfare of young people and vulnerable adults receiving education and training is safeguarded and promoted.

1.2 Policy Statement and Intent

1.2.1 Telford College (hereafter referred to as we) recognises their moral and statutory responsibility to safeguard and promote the welfare of all young people and vulnerable adults. We are committed to ensuring we have a holistic approach to safeguarding that provides a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of all our students.

1.2.2 Throughout the policy and procedures, reference is made to 'young people'. This term is used to mean those under the age of 18, consistent with Keeping children safe in Education (KCSIE 2026). The Corporation recognises that some adults may also be vulnerable to abuse, and, accordingly, the procedures may be applied to allegations of abuse and protection of vulnerable adults. All young people and vulnerable adults regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm.

1.2.3 The governing body will ensure that they will safeguard and promote the welfare of students and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those young people and vulnerable adults who have been harmed or are at significant risk of being harmed.

1.2.4 This policy sets out how the governing body of the Corporation is carrying out its statutory responsibility to safeguard and promote the welfare of young people and vulnerable adults in accordance with Section 175 of the Education Act 2002.

1.2.5 This policy applies to all staff (teaching and non-teaching), governors, volunteers, contractors, temporary and supply staff working at Telford College.

1.2.6 This policy will be reviewed annually by the governing body and is in line with the requirements of Working Together to Safeguard Children (DfE, March 2026), Keeping Children Safe in Education (DfE, September 2026).

1.2.7 This policy is made available to parents/carers on request and published on Telford College's website, so that parents/carers understand the safeguarding responsibilities placed on the college.

1.2.8 The welfare of our students is our paramount concern. Our college is a community, and we all (staff, governors, parents/carers, families and students) have an essential role to play in making it safe and secure. This includes maintaining an attitude of "it could happen here" where safeguarding is concerned.

1.2.9 Safeguarding and promoting the welfare of young people and vulnerable adults is everyone's responsibility. Everyone who comes into contact with young people or vulnerable adults and their families has a role to play in safeguarding them.

1.2.10 Telford College makes every effort to provide a safe and welcoming environment, underpinned by a culture of openness where young people, vulnerable adults and adults feel secure, able to talk, believe they are being listened to, and know their concerns will be treated seriously. Where there is a safeguarding concern, the College will ensure that the young person's wishes and feelings are taken into account and that the response will be student-centred when determining what action to take and what services should be provided.

1.3 Telford College in Partnership with TWSP Priorities:

1.3.1 There are three current thematic priorities across Telford and Wrekin Safeguarding Partnership, namely Domestic Violence and Abuse, Exploitation and Neglect. There is a sub-group for each thematic area, with Exploitation split between adults and children. Additional safeguarding risks for consideration are as follows; students who have identified SEND needs (including those with identified SEMH needs), students with English as an additional Language, the LGBTQ+ community, those experiencing poor mental health, financial pressures and social media interaction between children and young people.

1.4 Implementation

1.4.1 Telford College will:

- ensure clear procedures for reporting and dealing with allegations of abuse including any allegations of abuse against members of staff and concerns that do not meet the harm threshold (low-level concerns).
- provide a cross-college approach to safeguarding, including information about our universal offer in accordance with the Telford and Wrekin Partnership Pathway to support framework
- provide appropriate support to students who are at risk, or may have experienced harm. For example, offering them the services of a counsellor/mentor and external services where appropriate.
- continue with our training schedule to ensure all staff are trained and familiar with the Safeguarding Policy and Procedures.
- promote the safe recruitment of staff in compliance with the Disclosure and Barring Service (DBS) regulations, including enhanced DBS checks to ensure staff are not prohibited from teaching as well as obtaining and checking of references and identity checks.
- ensure that the DSL is an integral member of the Senior Leadership Team.
- as a College, educate and encourage students to keep safe through the provision of curriculum opportunities which include safeguarding. Tutorials for full-time 16-18 year-old students, and aspects of the curriculum (for example, personal, social and health and economic education, PSHE) include an emphasis on relationships (healthy relationships and sex education), building confidence, critical thinking skills, and resilience in students, developing preventative strategies to ensure their own protection and that of others whilst promoting fundamental British Values and staying safe both on and offline.
- provide opportunities for students to develop the knowledge, skills and strategies they need to stay safe from abuse. For example; assessing risk, positive self-esteem, emotional literacy, assertiveness, understanding of healthy relationships, sex and relationships education (including consent, CSE and sexual harassment), online safety, preventing radicalisation, female genital mutilation, and anti-bullying. Clear advice and guidance is built into the curriculum to ensure that students understand who they can turn to for advice and support and that they know where and how to report abuse.

1.5 Impact

1.5.1 Telford College young people and vulnerable adults are safe. Students report feeling safe and they know how to report concerns. Young people and vulnerable adults thrive with the extensive wraparound support on offer by the college and the college's commitment to safeguarding and promoting the welfare of all.

1.5.2 All staff are clear about the college's policies and procedures. Students are confident that any concerns they have will be taken seriously and dealt with swiftly and they have a good awareness of safeguarding risks.

1.5.3 Telford College's Designated Safeguarding lead reports *at least* termly to the corporation board to keep them abreast of our position, emerging risks and trends amongst students, and locally, and actions that have been taken to mitigate and reduce risks to student, and their impact. This is an opportunity for the board and executive leadership to support and take action as needed.

1.6 Summary & Aims

1.6.1 Telford College have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002 (as amended) and the Apprenticeships, Skills, Children and Learning Act 2002 (as amended).

1.6.2 The Children Act 1989 and 2004 introduced the concept of significant harm as the threshold which justifies compulsory intervention in family life in the best interests of children.

1.6.3 Under Section 17 (10) of the Children Act 1989, a child is in "need" if:

- He/she is unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority.
- His/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
- He/she is disabled.

1.6.4 In relation to the risk of harm to our vulnerable adult students, we refer to the Care Act 2014, which requires local authorities to make enquiries where they reasonably suspect an adult has care and support needs and is experiencing, or at risk of, abuse or neglect, and is unable to protect themselves as a result.

1.6.5 These are known as statutory Safeguarding Adult, or 'Section 42' enquiries. The objectives of a Section 42 enquiry are to establish facts, assess the needs of the adult for protection, support and redress, protect from abuse and neglect in accordance with the wishes of the adult, decide on follow-up action, and enable the adult to achieve resolution and recovery.

1.6.6 The following legislation and guidance is relevant to this policy and set of procedures:

- Statutory Guidance: Working together to safeguard children 2026.
- Statutory Guidance: Keeping children safe in education 2026 - GOV.UK (www.gov.uk)
- Statutory guidance: Mandatory reporting of female genital mutilation: procedural information
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE July 2024).
- The Sexual Offences Act 2003
- Where applicable, the Human Rights Act 1998
- The Counterterrorism and Security Act (2015), section 26 The Prevent Duty
- Domestic Abuse Act 2021
- Equality Act 2010 and the Public Sector Equality Duty
- What to do if you are worried a child is being Abused - Advice for Practitioners (March 2015)
- Safeguarding children who may have been trafficked

1.6.7 We recognise the NSPCC website also provides us additional information on abuse and neglect and what to look out for.

1.6.8 All child protection matters will be dealt with in line with the arrangements of Telford and Wrekin Safeguarding Partnership (TWSP) and West Midlands Child Protection and Safeguarding Procedures or, if relevant, the safeguarding partnership area students reside in, under the care of or with designated responsibility.

1.6.9 This policy replaces the previous policy of September 2025.

1.6.10 Telford College has a duty of care to all students, including young people and vulnerable adults. The safety and protection of all students is of paramount importance. The aim of this policy is to make all within our college feel safe, promote their welfare and have clear roles and responsibilities in place. We are committed to inter-agency working to keep all our students safe. All our community believe that our college should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual student.

1.6.11 The governing body will ensure that all staff have read Part one of KCSIE 2026 in full. Those working directly with students will also read the relevant sections of Annex A (Further information) of KCSIE 2026. All members of the governing body and the Designated Safeguarding Lead (DSL) and their deputies will read all parts of KCSIE 2026 and Working Together to Safeguard Children 2026. We will maintain a record of this.

1.6.12 Our policy and all supplementary policies and procedures are published on our website for all to view. It will be reviewed annually and updated in line with any further statutory changes.

2 Safeguarding information: a student-centred and coordinated approach to safeguarding.

2.1.1 All those who are part of our college, including our staff, are an important part of the wider safeguarding system for all our students.

2.1.2 It is **everyone's** responsibility to safeguard and promote the welfare of all our students; this includes everyone who encounters students and their families. Everyone will consider, at all times, what is in the best interest for the students, and ensure their practice is student-centred. This responsibility is set out in all staff's job descriptions.

2.1.3 No one will manage concerns about a student in insolation. **Everyone** will identify concerns, share information and take prompt action to help ensure students receive the right help at the right time.

2.1.4 For the purpose of this policy, safeguarding and promoting the welfare of students is defined as:

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

2.1.5 'Young people' includes everyone under the age of 18. Some students and apprentices will be adults', over the age of 18. Vulnerable adults over 18 are considered and supported as part of our commitment to student safeguarding practices and procedures regardless of age or level of study.

2.2 The role of our staff

2.2.1 All staff will identify concerns early, provide help for students, promote their welfare and prevent concerns from escalating. They will provide a safe environment in which students feel safe and can learn.

2.2.2 Telford College is committed to identifying students who may benefit from **Family Help**. Family Help means providing support as soon as a problem emerges at any point in a student's life, from targeted early help through to statutory services.

2.2.3 The DSL, DDSL and Safeguarding Officers' roles are to advise on safeguarding concerns, support others to carry out their safeguarding duties, and liaise with other agencies.

2.2.4 All teachers, including the Principal in accordance with the Teachers' Standards 2011 (updated 2021) will safeguard students' well-being and maintain public trust in education as part of their professional duties.

2.3 Staff Safeguarding training and induction

2.3.1 All staff will receive an induction, so that they are aware of our safeguarding systems. This will include the safeguarding, and prevent policy, along with relevant policies and procedures such as our positive behaviour process and Whistleblowing policy. We will provide copies of policies and a copy of Part one) or KCSIE 2026 to all staff at induction. We will maintain a record of induction.

2.3.2 Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will be refreshed every three years as a minimum. All staff will also receive at least annual child protection and safeguarding updates (including online safety), to provide them with relevant skills and knowledge to safeguard all students effectively. All staff will receive annual training in child exploitation awareness. We will ensure staff safeguarding training is integrated, aligned and considered as part of whole college safeguarding approach and wider staff training and curriculum planning, and helps staff to understand local safeguarding procedures. We will maintain a record of training.

2.3.3 All staff will be made aware of the following:

- Telford & Wrekin Family Help offer and their role within it.
- the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) and the role they might be expected to play in such assessments.
- the process of making a sec 42 enquiry for an adult we are concerned may be at risk of harm, abuse or neglect and, has care and support needs, (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- what to do if a student tells them he/she is being abused, exploited or neglected.
- how to reassure victims that they are being taken seriously and that they will be supported and kept safe; that young people, and vulnerable adults may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful.
- staff should be professionally curious and speak to the DSL or their deputies if they have concerns about young people, students and apprentices, and
- staff should build trusted relationships with students which facilitate communication.

2.3.4 Telford College will encourage staff to consider the TWSP briefing on professional curiosity.

2.3.5 Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or DDSL) and children's social care. Staff will never promise a student that they will not tell anyone about a report of any form of abuse, neglect and/or exploitation as this may ultimately not be in the best interests of the individual. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. Staff will record how they have reassured victims.

2.4 Family Help

2.4.1 Telford College believe that **any** student may benefit from Family Help, and we ensure that all staff are alert to the potential need for Family Help for all students who;

are disabled or have certain health conditions and have specific additional needs;

- have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- have a mental health need,
- are young carers;
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines,
- are frequently missing/absent from education, care or from home,
- have experienced multiple suspensions and are at risk of being permanently excluded;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation,
- has a parent or carer in custody, or is affected by parental offending,
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse,
- is misusing drugs or alcohol themselves,
- has returned home to their family from care,
- is at risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or forced marriage,
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the day.

2.4.2 At Telford College our Family Help offer is aligned with the expectations of Working Together to Safeguard Children 2026, ensuring that students and families receive the right support at the right time, at the targeted early help level of Family Help and, where needed, through statutory services. We use the Telford & Wrekin Threshold Pathway to support Guidance to inform our decisions and work collaboratively with partners to deliver integrated support.

2.4.3 Telford College ensures that all students that disclose that they have taken an overdose, go to the Emergency Department at the nearest hospital to be checked by a medical professional in line with the TWSP Procedure for the management of overdoses, involving children within schools and colleges.

2.5 Young carers

2.5.1 Legislation defines a 'young carer' as '…a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work).' A young carer might look after someone because they are sick or have a disability or mental health issues. Or, if a parent or family member has an alcohol or drug dependancy, they may be unable to care for themselves or anyone else.

2.5.2 We recognise the responsibilities of young carers are wide and varied but can include:

- practical tasks, such as cooking, housework and shopping,
- physical care, like helping someone out of bed,
- emotional support, including talking to someone who is distressed,
- personal care, such as helping someone dress,
- managing the family budget and collecting prescriptions,
- helping to give medicine,
- helping someone to communicate, and

- looking after brothers and sisters.

2.5.3 Caring for someone can be very isolating, worrying and stressful for young people, students and apprentices. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss college, and that this can have a lasting effect on their life chances.

2.5.4 The aim of Telford College is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the Telford and Wrekin Young Carers Service to do this.

2.5.5 All staff are trained on the indicators of abuse, neglect and exploitation, and understand students can be at risk of harm inside and outside of our college, and inside and outside of the harms online. Staff will exercise professional curiosity and know what to look out for because this is vital for the early identification of abuse and neglect to identify cases of students who may be in need of help or protection.

2.5.6 We believe that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events. All staff, but especially the DSL and their deputies will consider whether students are at risk of abuse or exploitation in situations outside of their families. Extra-familiar harms take a variety of different forms and young people; students and apprentices, can be vulnerable to multiple harms.

2.5.7 All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. We understand students are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via both online and offline. Students can also abuse other students online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes and semi-nudes, including images digitally altered or generated using artificial intelligence, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

3 Safeguarding issues

3.1 Abuse, Neglect and Exploitation

3.1.1 **Abuse:** a form of maltreatment of young people, students and apprentices. Somebody may abuse or neglect a student 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 students of all forms of domestic abuse, including where they see, hear or experience its effects. Students 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. Students may be abused by an adult or adults or by another student.

3.1.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person. The fabrication or induction of illness (FII) in young people is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the young person's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information. We adopt the guidance 'Safeguarding children in whom illness is fabricated or induced' and 'TWSP FII Best Practice Guidance'.

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

3.1.4 **Sexual abuse:** involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. 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. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people. The sexual abuse of young people by other young people is a specific safeguarding issue in education and all staff are aware of the settings policy and procedures of dealing with this.

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

3.2 Child-on-child abuse (including harassment and violence) (in relation to students under the age of 18)

3.2.1 **All** staff are aware that students can abuse other students. This can happen inside or outside of our college and online.

3.2.2 **All staff** will be trained in our policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it, and responding to where they believe a student may be at risk from it.

3.2.3 **All staff** understand that even if there are no reports in our college it does not mean it is not happening, it may be that the abuse is just not being reported. When staff have **any** concerns regarding child-on-child abuse, even if there are no reports in our college, they should still speak to the DSL (or DDSL).

3.2.4 **All** staff are expected to challenge inappropriate behaviours between peers, examples of which are listed below, that are abusive in nature. Downplaying certain behaviours or dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", can lead to a culture of unacceptable behaviours, an unsafe environment for young people and vulnerable adults, and in worst case scenarios, a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it. Our procedures reflect the guidance in Part Five of KCSIE 2026, ensuring that all reports are taken seriously, victims are supported, and appropriate safeguarding and disciplinary actions are taken. We recognise that child-on-child abuse can occur in any setting and must never be tolerated or passed off as "banter" or "part of growing up."

3.2.5 Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between students (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 element of online 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 stand-alone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery),
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- 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).

3.2.6 We will actively seek to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors, our senior leadership team, staff, students, and parents/carers about this issue,
- educating students about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum,
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing counselling, and therapy to address underlying mental health needs,
- working with governors, the senior leadership team, and all staff, students and parents/carers to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the Telford College community;
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-college culture;
- responding to cases of child-on-child abuse promptly and appropriately; and
- ensuring that all child-on-child abuse issues are fed back to the DSL and DDSL so that they can spot and address any concerning trends and identify students who may be in need of additional support.

3.2.7 At Telford College, we will actively engage with TWSP in relation to child-on-child abuse, and work closely with, for example, children's social care, the police and other education settings. The relationships our college has built with these partners is essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The DSL (or a DDSL) will regularly review behaviour incident logs (Promonitor) which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

3.2.8 We recognise that any student (under 18) can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse among all young people, students and apprentices. Individual and situational factors can increase a student's vulnerability to abuse by their peers. We know that research suggests:

- child-on-child abuse may affect males differently from females (i.e. that it is more likely that females will be victims and males perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously,
- students with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
- some students may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

3.3 Child-on-child sexual violence and sexual harassment (in relation to students under the age of 18)

3.3.1 All those who are part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

3.3.2 We understand that sexual violence and sexual harassment can occur between two or more students **of any age and sex.** It can occur online. It can also occur through a group of students sexually assaulting or sexually harassing a single student or group of young people, students and apprentices. Sexual violence and sexual harassment exist on a continuum and may overlap.

3.3.3 We recognise that students 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) attend(s) our college.

3.3.4 We will work to ensure our Telford College community are aware of the importance of:

- challenging inappropriate behaviours,
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up,
- not tolerating or dismissing sexual violence or sexual harassment; and,
- 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.

3.3.5 For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis. In some instances, we will use terminology such as 'reporter' and 'reported'.

3.3.6 Along with providing support to students who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate, and implement any disciplinary sanctions. We recognise that a student abusing another student may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our college. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

3.3.7 Telford College understands that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other young people, students and apprentices, adult students and our staff are supported and protected as appropriate.

3.3.8 We will try to be aware of, and respond appropriately to **all reports and concerns**, including those outside of our college, and or online.

3.3.9 While the focus of this policy is on protecting and supporting young people, and vulnerable adults, we will of course protect any adults and engage with adult social care, support services and the police as required.

3.4 Sexual violence

3.4.1 Our staff are aware of sexual violence, and the fact students can, and sometimes do, abuse their peers in this way both inside and outside of our college. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as listed below:

3.4.2 **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

3.4.3 **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

3.4.4 **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.

3.4.5 **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, (B) does not consent to engaging in the activity, and (A) does not reasonably believe that (B) consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

3.4.6 We believe that **consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

3.4.7 **Sexual consent**

- a young person under the age of 13 can never consent to any sexual activity,
- the age of consent is 16,
- sexual intercourse without consent is rape.

3.5 Sexual harassment

3.5.1 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline, both inside and outside of our college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

3.5.2 We will follow the guidance set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

3.6 Upskirting

3.6.1 The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. We recognise 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

3.7 Harmful sexual behaviour

3.7.1 Students' sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the term "harmful sexual behaviour" (HSB). HSB can occur online and/or face to face and can also occur simultaneously between the two. We will consider HSB in a child protection context.

3.7.2 We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL/DDSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment. This training will include the Brook Traffic Light Tool.

3.7.3 Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Students displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

3.8 Hate crime

3.8.1 A hate crime, or hate incident, is an act motivated by, or perceived to be motivated by, prejudice against who the victim is, or what they appear to be, in relation to their race, religion, sexual orientation, gender identity, or disability. These are known as protected characteristics. It does not matter if the person targeted has the characteristic that the prejudice is directed toward. Only that they are perceived to have that characteristic or belong to that community.

3.8.2 A hate crime does not have to amount to a criminal offence to be considered a hate crime. Non-criminal hate crime incidents can still be reported to the police to be recorded. Evidence of a hate crime is not required – it is enough that one person, such as the victim or a witness, perceives the incident to be a hate crime.

3.8.3 The Police and Crown Prosecution Service define hate crime as: "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."

3.8.4 Hate Crime covers a range of behaviours, including discrimination, exclusion, verbal abuse, physical assault, bullying including cyber-bullying and inciting hatred.

3.8.5 Hate Crime can manifest in the college environment. Our response may involve action and support from various agencies, including statutory agencies or educating the perpetrator about their language and impact. Following the incident, we will schedule check-ins with the victim to check on their well-being and ensure the issue has not continued.

3.8.6 All hate crime incidents reported in our college must be recorded. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around hate crime.

3.9 Racist incidents

3.9.1 A racist incident is "any incident which is perceived to be racist by the victim or any other person", according to the Stephen Lawrence Inquiry report.

3.9.2 We will comply with the Equality Act 2010 and not unlawfully discriminate against students or prospective students on the grounds of race (or other protected characteristics).

3.9.3 In line with the public sector equality duty (PSED) we will:

- Eliminate discrimination and other conduct that is prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.
- Comply with both specific education law on exclusions, and general law on discrimination, when suspending or permanently excluding young people, students and apprentices.

3.9.4 All racist incidents reported in our college must be recorded.

3.9.5 We will manage racist incidents in line with our anti-bullying policy and positive behaviour policy.

3.10 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

3.10.1 We recognise both CSE and CCE are forms of abuse. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual or criminal activity, it may involve being in exchange for something the victim needs or wants, and/or for the financial advantage or increased threat of violence. CSE and CCE can affect young people, both male and female and can include young people who have been moved for the purpose of exploitation. Information on CCE definition can be found on p.48 of Home Office's Serious Violence Strategy.

3.10.2 We know that different forms of harm often overlap, and that perpetrators may subject students to multiple forms of abuse, such as criminal exploitation and sexual exploitation.

3.10.3 In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

3.10.4 Students can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other young people, who themselves may be experiencing exploitation , where this is the case, it is important that the child perpetrator is also recognised as a victim.

3.10.5 Whilst the age of the students may be a contributing factor for an imbalance of power, there are a range of other factors that could make a young person more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

3.10.6 Some of the following can be indicators of both child criminal and sexual exploitation where young people, students and apprentices:

- appear with unexplained gifts, money or new possessions,
- associate with other students involved in exploitation,
- suffer from changes in emotional well-being,
- misuse drugs and alcohol,
- go missing for periods of time or regularly come home late; and regularly miss college or education, or do not take part in education.

3.10.7 We will provide additional support to students who have been exploited to help maintain them in education.

3.10.8 Staff understand that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, they are aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

3.10.9 If we feel that students may be being abused through exploitation, we will follow the Telford & Wrekin Council exploitation care and support pathway. We will always consider the Telford & Wrekin Council, 'explore more' document to support us in working with students to understand what sort of matters may indicate that a young person is being sexually exploited. We will consult in the normal way with the relevant local authority children's services team to seek advice through consultation. The concerns will be followed through sensitively and appropriately with fellow professionals and the appropriate referral form will be completed. In relation to the CATE Risk Panels, where concerns are expressed around a young person attending our college, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP, A guide for professionals CATE leaflet.

3.10.10 We will make parents/carers, students and young people aware of the relevant TWSP CATE leaflets. We will provide them with information on CEOP, the Child Exploitation and Online Protection command. Students can use CEOP to report if they are concerned that a young person is being sexually abused or groomed online.

3.10.11 We will take a proactive approach to minimising the risk of all types of exploitation. We will engage with lived experience work, to benefit the whole-college community, including staff, students and parents/carers. All staff will receive training and updates on child exploitation.

3.10.12 As a college our curriculum includes a programme of appropriate exploitation awareness, especially CSE raising awareness.

3.10.13 The Principal and DSL will exchange any relevant information with local partners in relation to exploitation as required to enable all professionals to react, monitor and protect students. As a college the CSE DSL attends the CSE DSL network.

3.10.14 The DSL will work with the CSE lead to focus on child exploitation, especially CSE and provide any required information to partners. The CSE lead will be known to parents/carers and students. We will ensure the CSE lead is accessible to young people, students and apprentices.

3.10.15 Telford College record all concerns about a student's welfare, including those relating to exploitation, especially CSE. We detail what the concerns are, what action was taken and what follow up is needed. The DSL will review all recorded safeguarding concerns, especially those pertaining CCE and CSE, as a minimum every six months to ensure all concerns are routinely recorded and shared with partner agencies.

3.10.16 We will carry out an annual review to consider the adequacy of our site security provision, including monitoring and recording any unauthorised access to our site, to ensure that our students are protected from potential perpetrators of child exploitation, especially CSE while at Telford College. Any concerns will be shared as required with the police and/or Family Connect. Our site security audit findings will be used to update and review our site security risk assessment.

3.10.17 We act in the spirit of the recommendations pertaining to schools and colleges from the published report of the Independent Inquiry Telford Child Sexual Exploitation, published July 2022.

3.10.18 We will use the Telford & Wrekin Pathway to Support Guidance, Child Exploitation Risk Threshold Indicator and 'explore more' document to identify the care and support needs of students involved in exploitation. Where care and support needs are identified as 'vulnerable', 'complex' or 'acute', we will refer to Family Connect. We will complete the West Mercia Police Protected Partner Intel form to share any relevant exploitation intelligence; this will be emailed to protect@westmercia.pnn.police.uk. In emergencies we will report information to the police via 999 for non-emergencies we will report information to the police via 101.

3.11 Child Criminal Exploitation (CCE)

3.11.1 Some specific forms of CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

3.11.2 We recognise that this type of exploitation can trap young people as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older students), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. Child Sexual Exploitation (CSE)

3.11.3 We use the Telford & Wrekin Safeguarding Partnership definition of CSE. CSE is a type of modern slavery when a male or female under 18 is sexually exploited for the benefit or gain of someone else. The benefit or gain can come in many forms such as increased social status or financial gain. Some victims are also trafficked for the purpose of exploitation. Multiple tactics are used to exploit the young person such as 'grooming' which is when the victim is given something, such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money in return for performing sexual activities or having sexual activities performed on them. Other methods may include violence, bullying and intimidation, with threats of physical harm or humiliation. Abusers are increasingly using the internet to target vulnerable young people, students and apprentices. It can happen across any device that's connected to the web, like computers, consoles, tablets, mobile phones and smart speakers. Young people can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming.

3.11.4 We also acknowledge the definition of CSE set out by the Department for Education. CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving young people in the production of sexual images, forcing them to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young people in preparation for abuse including via the internet. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. It may happen without the young person's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any young person, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

3.11.5 Some additional specific indicators that may be present in CSE are young people who:

- have older boyfriends or girlfriends,
- and suffer from sexually transmitted infections,
- display sexual behaviours beyond expected sexual development or
- become pregnant.
- Have regular missing episodes.

3.11.6 We will make the following further information on signs of a young person's involvement in sexual exploitation available to staff. Child sexual exploitation: guide for practitioners

3.12 County Lines

3.12.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of "deal line." This activity can happen locally as well as across the UK - no specified distance of travel is required. Young people, students, apprentices and vulnerable adults are exploited to move, store/sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

3.12.2 Students can be targeted and recruited into county lines in a number of locations including our college, other education settings, student's homes and care homes.

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

3.12.4 A number of the indicators for CSE and CCE as detailed above may be applicable to where students are involved in county lines. Some additional specific indicators that may be present where a young person is criminally exploited through involvement in county lines are students who:

- go missing (from college or home) and are subsequently found in areas away from their home,
- have been the victim or alleged perpetrator of serious violence (e.g. knife crime),
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs,
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection,
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing'

or hotel room where there is drug activity,
- owe a 'debt bond' to their exploiters; and
- have their bank accounts used to facilitate drug dealing.

3.12.5 We will make the Home Office guidance on the signs of a young person's involvement in county lines, available to staff.

3.12.6 If a young person is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as CLIMB.

3.13 Modern Slavery and the National Referral Mechanism (NRM)

3.13.1 Staff understand that Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

3.13.2 We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

3.14 Mental Health

3.14.1 All staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

3.14.2 We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health concern or be at risk of developing one.

3.14.3 Where students have a mental health need, we will implement a safety plan as appropriate. We will use guidance from the following sources to implement a safety plan for students with mental health needs. Safety plans will be dynamic and regularly reviewed.
- Self-harm | Advice for young people | Get help | YoungMinds
- Self-care | Anna Freud
- Safety Planning - Every Life Matters (every-life-matters.org.uk)

3.14.4 Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these students' experiences can affect their mental health, behaviour, and education.

3.14.5 If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL or a DDSL and recording their concern. We will obtain medical help for young people who are experiencing mental health issues, where required.

3.14.6 Like with medical conditions, we will always obtain confirmation of mental health diagnoses from a suitable professional when diagnosis is self-reported or reported by parents/carers.

3.14.7 Please refer to our Mental Health & Well-being policy.

3.15 Students requiring mental health support

3.15.1 We recognise that we have an important role to play in supporting the mental health and wellbeing of our young people, students or apprentices.

3.15.2 Mental health concerns can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. The governing body have put clear systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

3.15.3 We will help prevent mental health concerns by promoting resilience as part of our integrated, whole setting approach to social and emotional wellbeing, which is tailored to the needs of our students.

3.15.4 **Our senior mental health lead is Caroline Welson.** The appointed member of our leadership team who supports our senior mental health lead is **Channelle Nixon**.

3.15.5 Please see our mental health and well-being policy.

3.16 Suicide Intervention

3.16.1 At Telford College, we accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We too work with our students and work in partnership to support anyone in our community that may have thoughts of suicide. We will follow our Suicide Intervention Policy and process to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject http://zerosuicidealliance.com/

3.17 Serious violence

3.17.1 All staff are aware of the indicators, which may signal that students are at risk from or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We recognise that the likelihood of involvement in serious violence may be increased by factors, such as being male, having been previously frequently absent or permanently excluded from school and having experienced child maltreatment and having been involved in offending. Staff are aware of the associated risks and understand the measures in place to manage these.

3.17.2 We will consider the risk in the hours just before or just after college, when students are travelling to and from college is when violence can often peak, and these times can be particularly risky for young people involved in serious violence.

3.17.3 We will follow the advice provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance.

3.17.4 We recognise to help prevent violence in our college this can require a mix of universal, targeted or specialist interventions. Our setting leaders will aim to:

- develop skills and knowledge to resolve conflict as part of the curriculum,
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour,
- understand risks for specific groups, including those that are gender-based, and target interventions,
- safeguard, and specifically organise child protection, when needed,
- work with local partners to prevent anti-social behaviour or crime.

3.17.5 In order to tackle violence affecting our college and the community, we know it is important to:

- understand the problems that young people are facing both in our college and in their local community,
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources or expertise).

3.17.6 Working with the local community safety partnership, Serious Violence Duty Sub-group, the youth offending team and the neighbourhood police team will help us to achieve a full understanding of the context we are working in. As part of our emergency management planning, we have in place systems for targeting and responding to individual or group violence. Even if violent incidents themselves do not appear to be an immediate concern, there may be a need to build resilience to such problems for the future.

3.17.7 Evidence shows that early-stage intervention is an effective strategy for preventing students becoming involved in violence, crime or antisocial behaviour later in life. We will assess what will work best in preventing violence in our college to decide who to involve in providing intervention.

3.18 Domestic abuse

3.18.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Students can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

3.18.2 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

3.18.4 Students can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed, and both young victims and young perpetrators should be offered support.

3.18.5 We will always liaise with agencies in a two-way process where domestic abuse is a factor in a household. Students within our care will be supported where needed. We are part of the Operation Encompass process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and impact on student's development.

3.18.6 Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

3.18.7 We will use the following additional advice on identifying students who are affected by domestic abuse and how they can be helped:

NSPCC- UK domestic-abuse Signs Symptoms Effects

Refuge what is domestic violence/effects of domestic violence on children

SafeLives: young people and domestic abuse

Domestic abuse: specialist sources of support

Home: Operation Encompass

3.19 Homelessness

3.19.1 We understand that being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The DSL (and deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

3.19.2 We will consider homelessness in the context of students who live with their families, and intervention will be on that basis.

3.19.3 We recognise in some cases 16 and 17year-olds could be living independently from their parents/carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a DDSL) will ensure appropriate referrals are made based on the child's circumstances. In these cases, will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

3.20 Honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

3.20.1 We recognise that 'Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure our community are alert to the possibility of a child being at risk of HBA or already having suffered HBA.

3.20.2 If staff have a concern regarding a student that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or DDSL). As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary, the police.

3.21 FGM

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

We will follow the National FGM Centre Female Genital Mutilation: Guidance for schools.

4 Our approach

4.1 Preventing all forms of child-on-child abuse.

4.1.1 We will undertake pre-planning, training for staff and implement an effective child-on-child abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports. We will review these regularly. The DSL (or DDSL) will engage with the local response to child-on-child abuse.

4.1.2 We understand the best responses to child-on-child abuse are based on a whole setting approach to safeguarding and child protection and we will involve our whole community in this.

4.1.3 Systems are in place, well promoted throughout our college, and understandable and accessible to enable students to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

4.1.4 As part of our commitment to our young people, students and apprentices, we have identified the following DDSL and Safeguarding Officers, who are not part of our college's senior leadership team, as staff in our college, students can report child-on-child abuse to, if they choose not to report directly to a member of the senior leadership team.

- Caroline Welson: Deputy Designated Safeguarding (DDSL) Lead
- Emma Cromwell: Senior Safeguarding Officer
- Kirsty Welch: Senior Safeguarding Officer
- Joanne Kimm: Safeguarding Officer
- Sara Williams: Safeguarding and Wellbeing Officer
- Gail Pearson: Safeguarding Officer
- Eleanor Campion: Pastoral Wellbeing Officer
- Maxine Hatton: College Counsellor
- Shaun Bickley: Student Support Manager
- Tammy Sutton: Student Support Officer
- Helen Collins: SEND Pastoral and Transition Lead
- Katie McKeown: Admissions Manager
- Phoebe Shaw: Transition Manager
- Luke Phillips: Positive Behaviour Support Kimberley Gunter: Willow Tree Manager

4.1.5 All staff at Telford College will undertake training in how to respond to child-on-child abuse, including reports of sexual violence or sexual harassment. Our DSL and DDSL will undertake training to manage a report.

4.1.6 We accept the most effective preventative education programme will be through a whole setting approach that prepares students for life in modern Britain.

4.1.7 Our setting has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of life at Telford College. This is underpinned by our positive behaviour policy and pastoral support system, and by our planned programme of evidence-based content delivered through the tutorial curriculum. Our programme is developed to be age and stage of development appropriate. The DSL will support teachers in their delivery of this part of our curriculum. We recognise good practice allows students an open forum to talk through things. Such discussions can lead to increased safeguarding reports. students will be made aware of the processes to raise their concerns or make a report and how any report will be handled. This will include processes when they have a concern about a friend or peer. All staff are aware of how to support students and how to manage a safeguarding report from another student.

4.1.8 The DSL will consider if external support or intervention is necessary as part of our approach to sexual violence and sexual harassment. We recognise specialist organisations can offer a different perspective and expert knowledge.

4.2 Responding to child-on-child abuse, including reports of sexual violence or sexual harassment and hate crime.

4.2.1 It is our aim to always recognise, acknowledge and understand the scale of harassment and abuse. We aim to never downplay some behaviours related to abuse that can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.

4.2.2 Where necessary we will work with other professionals, agencies and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police and other services.

4.2.3 We recognise that students may not find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope staff will notice and react. In some cases, the victim may not make a direct report.

4.3 Tackling Violence Against Women and Girls (VAWG)

4.3.1 We are committed to the principles of the Government's Tackling Violence Against Women and Girls Strategy (2021), which prioritises prevention, supports victims, pursues perpetrators, and strengthens safeguarding systems.

4.3.2 This is informed, where relevant, by the findings of the Casey Audit into group-based child sexual exploitation, and by KCSIE 2026's continued emphasis on misogyny and misandry as forms of prejudice-based behaviour that must be recognised, challenged and recorded in the same way as other forms of discrimination.

4.3.3 We recognise that girls are disproportionately affected by sexual violence, harassment, and abuse, and that these harms can intersect with other vulnerabilities such as race, disability, and social disadvantage.

4.3.4 Our approach is trauma-informed, victim-centred, and rooted in early intervention. We will challenge all forms of gender-based violence, educate students on consent and respect, and work with partners to disrupt harmful behaviour and protect those at risk.

4.4 The immediate response to a report of child-on-child abuse, including sexual violence and/or sexual harassment.

4.4.1 If a member of staff thinks for whatever reason that a young person (under 18) may be at risk of or experiencing abuse by another young person, or that a young person may be at risk of abusing or may be abusing another young person, they should discuss their concern with the DSL (or DDSL) without delay.

4.4.2 We will reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of Telford College will not be downplayed and will be treated equally seriously. We will never give a victim the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report. We will explain that the law is in place to protect young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.

4.5 Risk assessment and safety planning & support

4.5.1 We take the view that child-on-child abuse does happen even if it is not reported. Students receive an extensive induction to outline behaviour expectations and policies they are expected to follow without exception.

4.5.2 When there has been a report of sexual violence, the DSL (or a deputy) will implement an immediate safety and support plan to identify risk and need. Where there has been a report of sexual harassment, the need for a safety and support plan will be considered on a case-by-case basis, but as good practice should be completed.

4.5.3 Our risk and needs assessment will consider:

- the victim, especially their protection and support,
- whether there may have been other victims,
- the alleged perpetrator(s),
- all the other students, (including adult students and, if appropriate, staff) at the college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and,
- the time and location of the incident, and any action required to make the location safer.

4.5.4 If any of the students involved has SEND, the DSL will liaise with the appropriate staff to assist in the management of the report. If the report involves an online safety element, any safeguarding officers will liaise with the DSL as the online safety lead.

4.5.5 Safety and support plans must be recorded (handwritten or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all of our students and put adequate measures in place to protect them and keep them safe. Safety and support planning will involve the relevant students, parents/carers and professionals.

4.5.6 The DSL/DDSL or safeguarding officers will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional safety and support plans by social workers and or sexual violence specialists will be required. Our safety and support plans are not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our students and updating our own risk assessment.

4.6 Action following a report of child-on-child abuse, including sexual violence and/or sexual harassment.

4.6.1 Our DSL/DDSL and safeguarding officers have a complete safeguarding picture, and they are the most appropriate people to advise on our initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and

any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other young people, students and apprentices.

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed.
- the ages of the students involved.
- the developmental stages of the students involved.
- any power imbalance between the young people, students and apprentices. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- are there ongoing risks to the victim, other students or college staff.
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

4.6.2 As always when concerned about the welfare of a young person, all staff will act in the best interests of the young person. In all cases, we will follow general safeguarding principles. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other students involved/impacted).

4.6.3 The starting point regarding any report will always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated.

4.6.4 As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any students involved in any report of sexual violence or sexual harassment, especially where a case is progressing through the criminal justice system.

4.7 Options to manage the report

4.7.1 When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop us taking immediate action to safeguard our children, where required.

4.7.2 We will regularly review our decisions and actions, consider our relevant policies and any lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within our college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

4.7.3 The DSL (or a deputy) will use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. The DSL and their deputies will consult the relevant local partnership threshold guidance to support their decision making and will engage in discussions with the statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, part of the local arrangements.

4.7.4 Our DSL (and deputies) have a complete safeguarding picture, and they are the most appropriate people to advise on our initial response. Important considerations will include:

4.7.5 In complex cases the DSL (or DDSL) may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.

4.7.6 Where the DSL (or DDSL) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum, or where the needs and circumstances of the individual student in question might otherwise require it, the DSL (or DDSL) will contact Family Connect or the local social care team for the young person and/or the police immediately and, in any event, within 24 hours of the DSL (or DDSL) becoming aware of the alleged behaviour. The DSL (or DDSL) will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

- management internally.
- Family Help.
- referral to a specialist support agency.
- referral to children's social care.
- reporting to the police.

4.7.7 In line with managing internally, the DSL or DDSL may decide that the student/s involved do not require referral to statutory services but may benefit from Family Help. Family Help is support for students of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing Family Help is more effective in promoting the welfare of young people than reacting later. Family Help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

4.7.8 All concerns, discussions, decisions, and reasons for decisions will be recorded (written or electronic).

4.7.9 If bail conditions are in place, we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within our college.

4.7.10 There may be delays in any case that is being progressed through the criminal justice system. We will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other young people, students and apprentices, and adult students in the college. The DSL/DDSL and safeguarding officers will work closely with the police (and other agencies as required), to ensure any actions we take do not jeopardise the police investigation.

4.7.11 If a student is convicted or receives a caution for a sexual offence, we will update our risk assessment. We understand it is important that we ensure both the victim and alleged perpetrator(s) remain protected. Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a 'not guilty' verdict, we will continue to offer support to the victim and the alleged perpetrator(s).

4.7.12 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL/DDSL will consider whether the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Family Connect or the relevant children's social care team may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our own behaviour policy.

4.8 Ongoing response to child-on-child abuse, including sexual violence or sexual harassment and hate crime

4.8.1 We will consider the principles based on effective safeguarding practice and to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s). We will consider what support is the most appropriate to support all students involved.

4.8.2 Victims may not talk about the whole picture immediately. It is essential that dialogue is kept open and encouraged. We will offer victims a designated trusted staff member in our college to talk about their needs.

4.8.3 A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, in particular, from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This will be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

4.8.4 While we will give all the necessary support to victims to remain in our college, if the trauma results in the victim being unable to do this, we will refer the students to the appropriate support agencies. This will only be at the request of the victim (and following discussion with their parents/carers).

4.8.5 We will always check in with all students involved or alleged to have been involved in child-on-child abuse that are in our college. This is to ensure our procedures have been followed and to understand their perception of the effectiveness of our procedures.

4.9 Child abduction and community safety incidents

4.9.1 We recognise child abduction as the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents/carers or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

4.9.2 We know that other community safety incidents in the vicinity of our college can raise concerns amongst students and parents/carers, for example, people loitering nearby or unknown adults engaging students in conversation.

4.9.3 As students get older and are granted more independence in college, we will give them practical advice on how to keep themselves safe. This may be advice and guidance about safe travel to and from college. We will aim to build on students' confidence and abilities rather than simply warning them about all strangers.

4.10 Students and the court system

4.10.1 We recognise that sometimes young people are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will signpost them to the guides for young people.

4.10.2 We will follow these guides to ensure the correct process is followed, and support and special measures are made available.

4.10.3 We understand that when child arrangements via the family courts are made following separation, this can be a stressful time and entrench conflict in families, and this can be stressful for young people. We will follow the guidance of the Ministry of Justice in managing these situations.

4.11 Students with family members in prison

4.11.1 We recognise that students who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from NICCO, to help mitigate negative consequences for those young people, students and apprentices.

4.12 Cybercrime

4.12.1 We understand cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a college computer network to look for test paper answers or change grades awarded.
- denial of service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

4.12.2 Students with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

4.12.3 If there are concerns about a student in this area, the DSL/DDSL, will consider referring into the **Cyber Choices** programme.

4.13 Parent conflict

4.13.1 We are committed to helping families to communicate better. We know that relationships are key, and positive communication is what we want to see.

4.13.2 Good quality relationships are a right and not a privilege. For many families, stress is a large part of everyday life and stress is often the reason relationships feel strained, and communication is poor. Whilst it can be hard to eliminate stress from everyday life, we understand that we can work towards improving the way we react, by communicating in more constructive ways.

4.14 FGM mandatory reporting duty for teachers

4.14.1 Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining young people, students and apprentices, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.

4.14.2 Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with our DSL (or DDSL) and involve children's social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect or the local social care team for the student or apprentice. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

4.14.3 In respect of FGM we will adopt the local FGM Practice Guidelines and Resource Pack as part of safeguarding responsibilities and inform/educate our staff in this particular area.

4.15 Forced marriage

4.15.1 We understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

4.15.2 A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding students from forced marriage.

4.15.3 We will follow the Forced Marriage Unit published statutory guidance and Multi-agency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

4.16 Preventing radicalisation

4.16.1 We understand students may be susceptible to radicalisation into terrorism. Like our role in protecting students from other forms of harms and abuse, we will also protect students from this risk as part of our safeguarding approach.

4.16.2 **Extremism** is the promotion or advancement of an ideology (A set of social, political, or religious ideas, beliefs, and attitudes that contribute to a person's worldview) based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights, or
- intentionally create a permissive environment for others to achieve the results in negating or destroying fundamental rights and freedoms or undermining, overturning or replacing liberal democracy. This also includes calling for the death of members of the armed forces.

4.16.3 **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

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

4.16.5 We accept that there is no single way of identifying whether a student or apprentice is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, such as family and friends may contribute to a student's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

4.16.6 We understand it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training, staff will be alert to changes in students' behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying students who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the DSL (or DDSL) who will consider making a Prevent referral.

5 The Prevent duty

5.1.1 We are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

5.1.2 We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210.

5.1.3 As a college/sixth form we will follow the additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

5.1.4 We will follow the published advice for schools on the Prevent duty.

5.1.5 We aim to ensure all staff have completed training on the Prevent duty.

5.2 Channel

5.2.1 Channel is voluntary, as a confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so. We will attend and engage with the Channel panel to assist in any assessment.

5.2.2 We will follow the Channel guidance.

5.2.3 If we feel young people/students are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a Prevent natonal referral form, following the Prevent flowchart. The referral will be sent to the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha,** jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is **Joanne Hanslip**, joanne.hanslip@telford.gov.uk. Where necessary, the DSL (or DDSL) will consult with the Telford and Wrekin professional lead, education lead or CTU officers: Alison Potts, a.potts@west-midlands.pnn.police.uk, or Holly Aungiers, holly.aungiers@westmercia.police.uk, to seek advice on making prevent referrals.

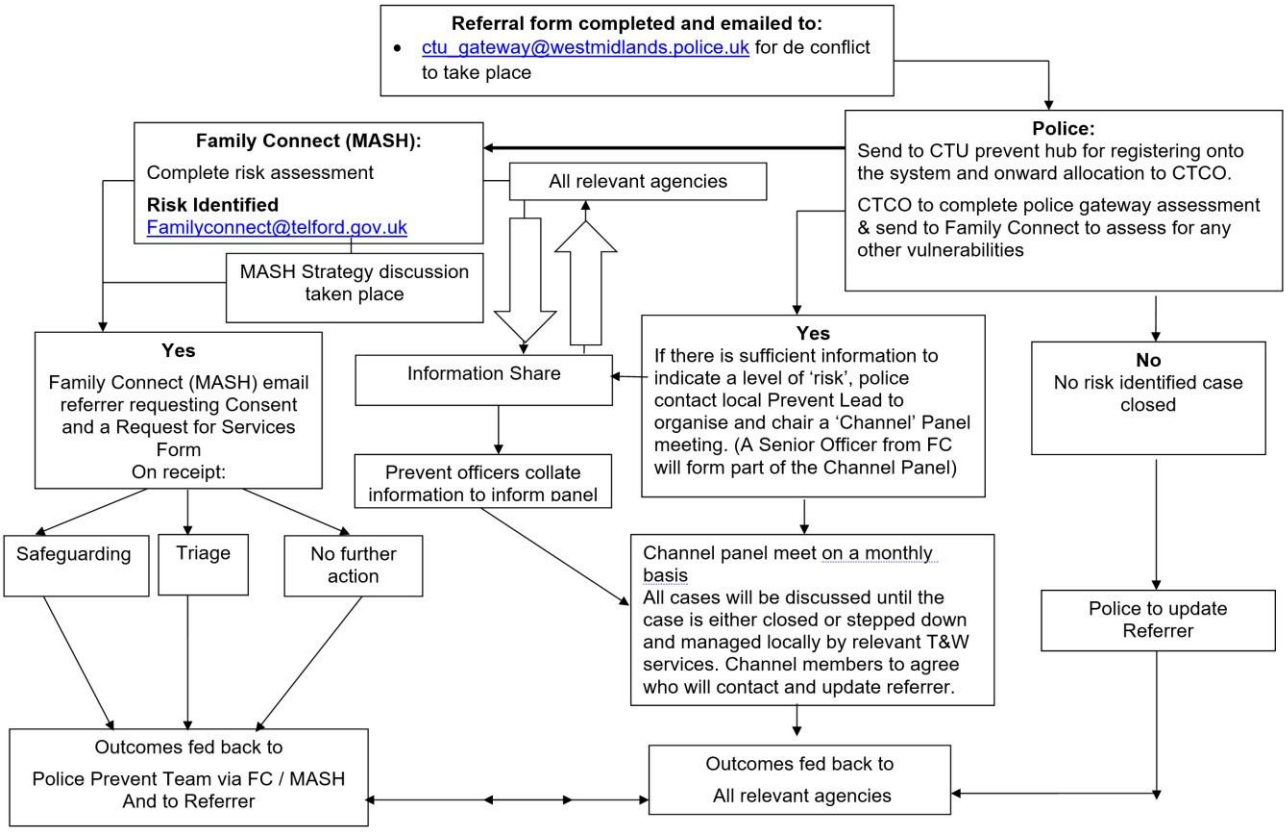


Figure 1: Telford and Wrekin co-operative council PREVENT referral process map 2026

5.3 Telford & Wrekin Prevent Pathway

5.3.1 Family Connect (MASH) will discuss with Police CTU to support the completion of a risk assessment at the earliest opportunity.

5.3.2 If referral is adult led and children are identified as being present/resident within the family home, the referral form will be shared with Family Connect along with all supporting evidence.

5.3.3 Safeguarding, Triage and No further action are key outcomes following the completion of 'Request for services' form.

5.3.4 Agreed outcomes will be shared between Family Connect and Police.

6 What to do if you have concerns about a student

6.1.1 Staff working in our college maintain the attitude of **'it could happen here'** where safeguarding is concerned and will always act in the **best interests** of the student.

6.1.2 If staff have **any concerns** about a student's welfare, they must act on them **immediately**.

6.1.3 The following flow chart sets out the process for staff when they have concerns about a student.

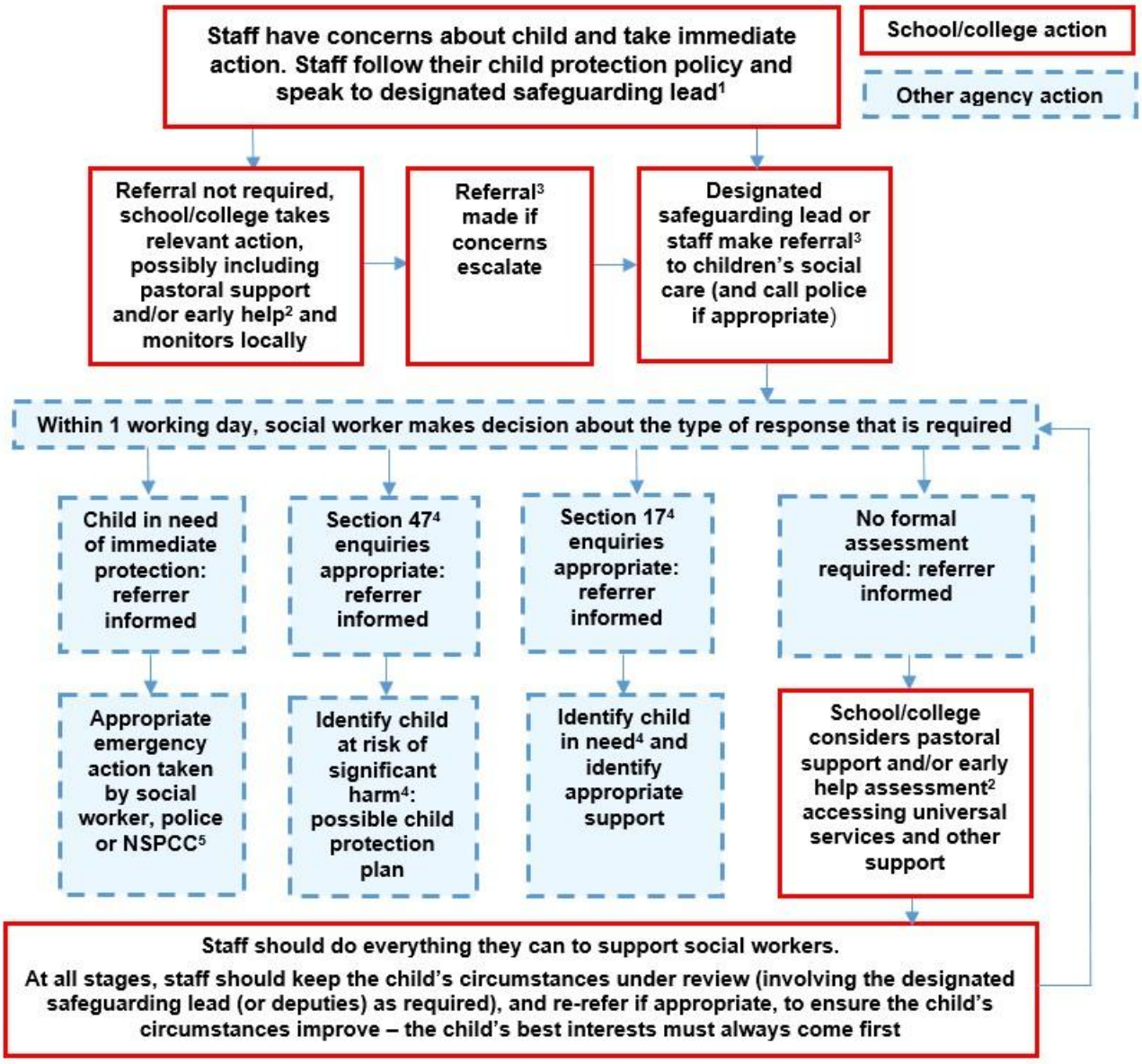


Figure 1: Telford and Wrekin co-operative council process map for managing a disclosure 2026

6.1.4 Where someone has a concern about the welfare of a student, they should speak to the DSL (or DDSL). Options will then include:

- managing any support for the young person internally via our own pastoral support processes,
- providing Family Help support and/or undertaking a Family Help assessment; or
- making a referral to statutory services, for example, the young person is in need or suffering or likely to suffer significant harm or impairment. This will involve contacting Family Connect or the local social care team for the student. When making a referral to children's social care staff will ensure they are aware of the young person's history, such as any previous concerns about the student or their family, so that they can share this information with children's social care staff.

6.1.5 The law does not say an age when parents/carers can leave a child on their own, but it is an offence to leave a child alone if it places them at risk. The NSPCC says:

- children under the age of 12 are rarely mature enough to be left alone for a long period of time
- children under 16 should not be left alone overnight
- babies, toddlers and very young children should never be left alone.

6.1.6 Where a child under 16 is alone and we feel it is placing them at risk we will contact the police. Where a young person is alone because they have left college without permission and parents/carers cannot locate the young person quickly, we will view the young person at risk and will contact the police. We will report all concerns about a young person being left alone to the police, via 101. If the young person is in immediate danger, then we will report to the police, via 999. We will then notify Family Connect or the emergency duty team as reasonably practicable.

6.1.7 NPCC- When to call the police will be considered by the DSL to help them understand when they should consider calling the police and what to expect when they do.

6.1.8 All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the Request for service form.

6.1.9 If in exceptional circumstances, the DSL or a DDSL is not available, the person who has the concern should speak to a member of the senior leadership team and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL (or DDSL) as soon as is practically possible.

6.1.10 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping students safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. If in any doubt about sharing information, staff should speak to the DSL or a DDSL.

6.1.11 In the unlikely event of a person in our college who has a concern for a student not being satisfied with the action taken by the DSL or DDSL, they should speak to them again to share their concerns. If they remain unsatisfied with the response, they should follow the college Whistleblowing procedures.

6.2 Referral agencies

Telford & Wrekin social care team **Family Connect 01952 385385 Out of Hours 01952 676500**	**Shropshire social care team** **First Point of Contact 0345 678 9021 Out of Hours 0345 678 9040**	**Staffordshire social care team** **Children's Advice and Support Service 0300 111 8007 Out of Hours 0345 604 2886**	**Wolverhampton social care team** **MASH 01902 555392 Out of Hours 01902 552999**
If you think a child is in immediate danger, **call the police on 999** **For non-police emergencies, call 101**			
Childline 0800 1111	**NSPCC 0800 800 5000**	**Public Protection Unit (West Mercia Police): 0300 333 3000**	

6.3 Immediate response to a child or parent

6.3.1 Staff will follow effective safeguarding practice which includes:

a. if possible, managing reports with two members of staff present, (preferably one of them being the DSL, DDSL or BeSafe team). However, this is not always possible;

- where the report includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCIS sexting advice (for schools and colleges). the key consideration is for staff not to view or forward illegal images of young people, students and apprentices. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

b. not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.

c. recognising a student is likely to disclose to someone they trust: this could be **anyone** in our college. It is important that the person to whom the student discloses recognises that the student has placed them in a position of trust. They should be supportive and respectful of the young person.

d. keeping in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

e. listening carefully to the students' reflecting, using the students' language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the students where necessary with open questions – where, when, what, etc or **TED** 'tell me', 'explain to me' and 'describe'. It is important to note that while leading questions should be avoided, staff can ask students if they have been harmed and what the nature of that harm was.

f. considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to them and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the student and not appear distracted by the note taking. Either way, **it is essential a *first-hand*, written record is made**.

g. only recording the facts as the student presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and

h. informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

6.3.2 If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

6.3.3 We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of students. We expect **concerns that arise in a morning will be reported to the DSL (or DDSL) by lunchtime that day**. **Concerns that arise in an afternoon should be reported by or as close to the end of the college day, or as soon as reasonably practicable**. Any concerns arising outside of the normal college day should be reported as quickly as possible. If in doubt, concerned parties should talk with the DSL (or DDSL). **Delay is unacceptable and may result in disciplinary action**.

6.3.4 **Where a student is suffering, or is likely to suffer from harm or impairment, we will make a referral to children's social care (and if appropriate the police) immediately.** If we are unsure which local authority the student lives in, we will use the online tool Report Child Abuse to Your Local Council to direct us to the relevant local children's social care contact number.

6.3.5 Children's social care assessments should consider where students are being harmed in contexts outside the home. Therefore, we will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

6.3.6 Our role is to refer the information received and **under no circumstances** become the investigator.

6.3.7 We will work appropriately with each student, their family and other agencies to protect in all cases the welfare of the student. We will work in partnership and fulfil the ethos and abide by the principles of the 2023 Telford and Wrekin threshold guidance or the threshold guidance for the local social care team for the student.

6.3.8 Staff working at this setting may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the student's situation does not appear to be improving or is getting worse.

6.3.9 Staff working at this setting will be made aware of the process for making referrals to children's social care, the police and statutory assessments. This is under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm), and the care Act 2014 as it relates to vulnerable adults. That may follow a referral; along with the role staff might be expected to play in such assessments.

6.3.10 A child in need is defined under the Children Act 1989 as a student who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a student who is disabled. Local authorities are required to provide services for students in need for the purposes of safeguarding and promoting their welfare. Students in need may be assessed under section 17 of the Children Act 1989.

6.3.11 Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a **student is suffering, or is likely to suffer, significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the student's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect, exploitation, female genital mutilation or other so-called 'honour based' violence, and extra-familial threats like radicalisation and sexual exploitation.

6.3.12 Where there are visible injuries, all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

6.3.13 Under **no** circumstances will staff photograph injuries seen on students. Our staff are not expert witnesses. If the concern is around non-accidental injury, then that is a matter that requires immediate attention on the day resulting in an appropriate referral to Family Connect or the local social care team or police for the student. Those professionals will control the process of photographic evidence gathering and assessment.

6.3.14 For staff to interpret any concerns we will assess each incident as it appears. In respect of assessing any bruising to a student we will refer to the Bruising of Children guidance produced by the TWSP to assist their decision making.

6.4 The role of the local authority

6.4.1 Within one working day of a referral being made, a local authority social worker should acknowledge receipt to us as the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

a) the student requires immediate protection, and urgent action is required.
b) any services are required by the student and family and what type of services.
c) the student is in need, and should be assessed under section 17 of the Children Act 1989.
d) there is reasonable cause to suspect the student is suffering or likely to suffer significant harm, and whether enquiries must be made and the student assessed under section 47 of the Children Act 1989; and
e) further specialist assessments are required to help the local authority to decide what further action to take.

6.4.2 The referrer will, even if they are not the DSL (or DDSL), follow up if this information is not forthcoming.

6.4.3 If, after a referral, the student's situation does not appear to be improving, we will consider following TWSP local escalation procedures or those for the safeguarding partnership for the student to ensure our concerns have been addressed and, most importantly, that the student's situation improves.

6.4.4 The Telford & Wrekin Council Director of Children's Services is **Jo Britton**.

6.5 Record keeping

6.5.1 **All** concerns will be recorded first hand by the person raising the concern, using the relevant paper or electronic recording system used by visitors, staff and supply staff. Concerns will be passed onto the DSL, DDSL or safeguarding officer in a timely manner. The member of the safeguarding team will record in writing any discussions and decisions made, and the reasons for those decisions, Information will be kept confidential and stored securely. We will keep concerns and referrals in a separate child protection file for each student using our on-line secure CPOMs system.

6.5.2 Records should include:

- a clear and comprehensive summary of the concern,
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

6.5.3 We follow the guidance in Annex B of KCSIE 2026 regarding the secure transfer, retention, and review of child protection records. All safeguarding records are reviewed annually and transferred securely when a child moves to another setting.

6.5.4 If in doubt about recording requirements, visitors, staff and supply staff will discuss with DSL (or DDSL).

6.5.5 Anyone who has a safeguarding concern should follow these recording principles:

a. record the date, time, place and context of the concern, recording facts and who you shared them with.
b. a record where you spoke with the student or parent/carer and personal safety details, such as 'I discussed the incident with the student in the manager's office with the door open' or justify if it were closed, but naming those who you told this to be the case.
c. If alone, reason that rationale stating 'the young person stated they would only confide in me if I was alone'.
d. if it is observation of bruising or an injury, try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg'.
e. note the non-verbal behaviour and the key words in the language used by the student or parent/carer (try not to translate into 'proper terms' ensuring that you use the student or parent's own words). Body language should be noted and support any record of disclosure; and
f. it is important to retain on file, signed original handwritten notes, and pass them on to the DSL (or DDSL) who may ask you to complete a written referral to children's social care.

6.5.6 Visitors, staff and supply staff must report to reception to request a discussion to share any concerns with a member of the BeSafe team. The visitor or supply member of staff should alert reception of this requirement as soon as their concern arises. The BeSafe team will record the concern directly onto CPOMS/place into the student's safeguarding record to help to maintain a first-hand record, making a record of the full name of the reporting staff member.

6.5.7 This college has adopted an electronically maintained recording system called Child Protection Online Management System (CPOMS). The CPOMS system is a totally secure system of record keeping which enables us to quickly encapsulate a student journey with us.

6.5.8 The DSL, DDSL and safeguarding team record all concerns on CPOMS. We will ensure that a restricted number of staff will have full access to this system as named key holders. If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.

6.5.9 Concerns are stored chronologically in a safeguarding file/electronically for that student.

6.6 Low level concerns

6.6.1 A low-level concern is defined as, any concern had about a staff member's behaviour towards, or concerning, a student that does not meet the harms threshold. The term 'low-level' concern does not mean that it is insignificant – a low-level concern is any concern that suggests a staff member working in or on behalf of the college may have acted in a way that:

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

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a student.

6.6.2 If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to young people, students or apprentices, then:

- this should be referred to the principal or DSL.
- where there are concerns/allegations about the principal, this should be referred to the chair of governors.
- where there are concerns/allegations about the DSL, this should be referred to the principal.

6.6.3 Any concerns about staff must be recorded on a low-level record form and stored using our secure HR system and referred to the principal or DSL.

6.6.4 Any allegations that may meet the harms threshold will be addressed as set out in Part four, Section one of KCSIE 2026. Any concerns that do not meet the harm threshold, referred to, as 'low level concerns' will be addressed as in Part four, Section two of KCSIE. When an allegation is made, the DSL will be responsible for ensuring that a student is not at risk and refer cases of suspected abuse to Family Connect or the student's local social care team.

6.6.5 Telford College will **only** undertake basic enquiries to help determine whether there is any foundation to the allegation.

6.6.6 The LADO for Telford & Wrekin Council will be informed of all allegations that come to our attention and appear to meet the criteria set out in Part Four, Section One of KCSIE, so they can consult police and children's social care services as appropriate. All LADO referrals must be made via Family Connect, unless the student is open to a social worker and then the LADO referral must be made via the student's allocated social worker.

6.6.7 The governing body will be notified of any allegations or low-level concerns at each scheduled meeting. The governor responsible for safeguarding will be informed soon after the allegation or low-level concern has been received. Their role is not to know details of the persons or concern but to ensure policies and procedures are adhered to and to provide relevant support. -See low-level concerns policy

6.6.8 We will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

6.6.9 We believe that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adopted by this setting for staff, volunteers, contractors and governors.

6.6.10 Guidance for safer working practice for those working with children and young people in educational settings produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with students. We will make all those in our community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

6.6.11 To help avoid potential allegations and safeguarding concerns, and for the safety and welfare of young people, students or apprentices, and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified; in these cases, the principal will make a judgement on a case-by-case basis being appropriate, balanced and proportionate.

6.6.12 Please see our procedure for managing safeguarding concerns, or allegations against staff (including supply staff, volunteers and contractors).

6.7 What to do if you are concerned about safeguarding practice in the college

6.7.1 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and know that such concerns will be taken seriously by our leadership team.

6.7.2 Please refer to our Whistleblowing procedures.

6.7.3 Where staff feel that they cannot report a concern through the above channels, general guidance can be found at Advice on whistleblowing. the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

7 The management of safeguarding

7.1.1 The designated governor with responsibility for safeguarding is Teresa Tanner.

7.1.2 The designated governor with responsibility for 'Prevent' is Teresa Tanner. Their role is to take leadership responsibility for our safeguarding arrangements.

7.1.3 The governing body has strategic leadership responsibility for our safeguarding arrangements and must ensure that we comply with their duties under legislation. They must have regard to KCSIE, ensuring our policies, procedures and training in our college are effective and comply with the law at all times.

7.1.4 Our governance work with college leaders to set a clear vision and approach with a focus on student well-being, safeguarding and child protection. This includes actively promoting the fundamental British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

7.1.5 Our principal will ensure that the policies and procedures, adopted by this governing body, are understood, and followed by all staff.

7.1.6 All governors have received appropriate safeguarding and child protection training (including online safety training) at induction. This will ensure they have the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in our college are effective and support the delivery of a robust whole-setting approach to safeguarding. This training will be updated annually.

7.1.7 The governing body will act under their obligations under the Data Protection Act 2018 and the UK GDPR, Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

7.2 Safeguarding Governance

7.2.1 Our governing body will ensure that we facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the student at the heart.

7.2.2 Where there is a safeguarding concern, our governing body and our senior leaders will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they will be well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. We will work with students to remove any barriers to reporting.

7.2.3 We will facilitate staff to contribute to and shape our safeguarding arrangements and Child Protection policy.

7.2.4 We will ensure that suitable arrangements are in place to provide access for all staff to access safeguarding supervision. Please see our Safeguarding Supervision policy.

7.3 Policies and procedures

7.3.1 We aim to ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote students' welfare.

7.4 The designated safeguarding lead (DSL)

7.4.1 Our governing body has appointed **Channelle Nixon** to be the DSL of this college and **Caroline Welson** to be the DDSL. We will set out their responsibilities in their job description.

7.4.2 **Channelle Nixon** will take ultimate responsibility for safeguarding and child protection, online safety, and understanding the filtering and monitoring systems and processes in place at our college as the DSL and as an appropriate **senior member** of staff from our **leadership team**. In line with Annex B of KCSIE 2026, the DSL is responsible for understanding the setting's filtering and monitoring systems, supporting staff with safeguarding concerns, promoting a culture of listening to children.

7.4.3 During term time, the DSL and/or DDSL will always be available (during our normal operating hours) for the staff to discuss any safeguarding concerns with. During out of hours/out of term activities we will provide appropriate cover by ensuring the DSL or DDSL is contactable.

7.4.4 In line with KCSIE 2026, we maintain robust cover arrangements so that safeguarding concerns are received, monitored and acted upon without delay whenever the DSL and any deputies are simultaneously unavailable due to illness, leave or other circumstances. This is provided through a confidential safeguarding mailbox, monitored throughout the working day by the safeguarding team, in addition to the escalation route to a senior leadership team member described elsewhere in this policy. These cover arrangements are made known to all staff.

7.4.5 Prior to any education visit, a risk assessment will be completed by the relevant staff member. All staff have access to the BeSafe (safeguarding) team contact details. Where safeguarding concerns are raised during an educational visit, the DSL (or DDSL) must be notified immediately, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

7.4.6 The DSL and any deputies will undergo two-day 'newly appointed designated safeguarding lead' training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one-day 'designated safeguard lead refresher training' as recognised by TWSP every two years. In addition to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council's Education Safeguarding noticeboard updates, attending termly designated safeguarding lead refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one DSL and any deputies attend each termly update. All designated safeguarding leads and any deputies will disseminate training to all relevant staff and governors.

7.4.7 The DSL will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council, Education Safeguarding Team. The DSL/DDSL maintains an up-to-date knowledge of local learning published by the TWSP and disseminates this learning to staff, leaders and governance as appropriate.

7.4.8 They will complete the 175 Safeguarding Audit in accordance with the 2002 Education act, each year and submit to TWSP. The 175 Safeguarding Audit, will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

7.4.9 **The DSL and their deputies will fulfil their role and responsibilities as set out in Annex B of KCSIE 2026.**

7.4.10 In line with Annex B of KCSIE 2026, the DSL is also responsible for understanding the setting's filtering and monitoring systems, supporting staff with safeguarding concerns, and promoting a culture of listening to children.

7.5 Multi-agency working

7.5.1 Our governing body and the DSL/DDSL are familiar with the TWSP arrangements. In Telford & Wrekin schools and colleges have been named as relevant agencies by the TWSP. We will engage with the TWSP as required and follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the student resides or for who is responsible for the student, to follow the local protocol for assessments.

7.5.2 The governing body of this setting expect staff to work with social care, the police, health services and other services to promote the welfare of students and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

7.5.3 The DSL is expected to consider the requirement for students to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

7.6 Information sharing

7.6.1 We recognise that information is vital in identifying and tackling all forms of abuse and neglect, and in promoting student's welfare, including their educational outcomes. Colleges have clear powers to share, hold and use information for these purposes.

7.6.2 We expect all staff to share information with practitioners and local agencies. We are committed to sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people, students or apprentices, whether this is when problems are first emerging, or where a student is already known to the local authority children's social care. Where children of the same family attend different education settings the DSL (or DDSL) will work with the DSLs of the other settings to ensure effective information sharing to help to identify, assess and respond to risks or concerns about the safety and welfare of children in the same family, where these details are known to the college.

7.6.3 All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS, the nominated persons are responsible, accountable, documented and are identifiable within our college for total security. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from our college by staff will be noted and signed for, as will files released to professionals.

7.6.4 The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

7.6.5 Student record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidentially.

7.6.6 In respect of files being released when requested by the Police under Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1))d)' should accompany that release and a copy will be retained for our records.

7.6.7 The we will also seek advice and adopt the Information sharing advice for safeguarding practitioners. If in any doubt we will seek advice from our Data Protection Officer. Upon releasing records, the college will request ID Badges for release. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

7.6.8 No statistics in relation to child protection are an important part of performance information. These may be shared by the DSL/DDSL with staff, other agencies or the governing body/management committee.

7.6.9 In our management of information sharing we will use the following:

a. Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing;
b. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful;
c. The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department; and
d. Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

7.6.10 When a student leaves Telford college, the DSL and BeSafe team will ensure their child protection file is transferred to the new education provider as soon as possible (within five working days of the student starting at their new college or education provider), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main student file. As a receiving college, we will ensure key staff such as DSL/DDSL, safeguarding officers and our high needs team, are aware as required. On receiving the child protection and safeguarding record for each child a DSL or DDSL will ensure a note is entered on to the student's protection and safeguarding record and summarise any concerns from the information they have received.

7.6.11 The school or previous setting DSL/DDSL will share any relevant safeguarding information with the new college or educational provider in advance of a student leaving, including where a student has been or is open to 'Channel' Panel. If we are the current host college, we will **not** photocopy and retain child protection records. This is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018 but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice.

7.6.12 All child protection records are reviewed annually in the summer term by the DSL, DDSL or Safeguarding Officers and checked to be chronological, tidy, legible and factual in content. The exception to this is safeguarding records where there are concerns of CSE, these are checked by the DSL every six months. This should be undertaken each year, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings, these should include attendance figures.

7.6.13 **Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of students.**

7.6.14 We will follow the guidance on the child protection file set out in Annex B of KCSIE 2026.

7.7 Opportunities to teach safeguarding

7.7.1 Telford College will teach students about how to keep themselves and others safe, including online. Our Tutorial programme is delivered in accordance with the RSHE Statutory Guidance July 2025. It is age-appropriate, inclusive, and designed to equip students with the knowledge and skills to recognise and report abuse, understand healthy relationships, and manage their mental and physical wellbeing. RSHE contributes to our wider safeguarding culture and is responsive to the needs of our students. We tailor the education provided, to the specific needs and vulnerabilities of individual students, including those who are victims of abuse, and those with special educational needs and/or disabilities. We will do this through our Tutorial programme.

7.7.2 We will ensure that appropriate filters and monitoring systems that are in place, do not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

7.7.3 Safeguarding themes are integrated across the curriculum, including Relationship and Sex and Health Education, computing, and pastoral education. Tutorials are adapted to meet the needs of SEND and EAL learners, and student voice is used to inform planning. Staff are trained to deliver safeguarding content in an age-appropriate and inclusive manner.

7.8 Online safety

7.8.1 We recognise online safety is a major concern for all professionals.

7.8.2 We believe it is essential that all students are safeguarded from potentially harmful and inappropriate online material.

7.8.3 The aim of our approach to online safety is empowerment to protect and educate students and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. We will ensure appropriate filtering and monitoring on college devices and networks. We aim to protect students from illegal, inappropriate or harmful content, and harmful online interaction with other users. We aim for our students to exhibit positive personal online behaviour and recognise inappropriate online conduct. We aim to protect young people, students or apprentices from commercial risks.

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, 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; for example: student to student pressure, commercial advertising and adults posing as students 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; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual 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. If we feel our students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

7.8.5 We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety while planning the curriculum, any teacher training, the role and responsibilities of the DSL (and DDSL) and any parental engagement.

7.8.6 We take seriously our duties to assist parents/carers and help them with online safeguarding resources. As such, we will make them aware of relevant support services.

7.8.7 Where young people, students or apprentices are being asked to learn online at home we will follow the advice to support schools and colleges to do so safely: Safeguarding in schools colleges and other providers and safeguarding and remote education. We recognise the NSPCC and PSHE Association also provide helpful advice.

7.8.8 Through our regular communications with parents/carers, we will reinforce the importance of young people, students or apprentices being safe online and tell parents/carers what systems we use to filter and monitor online use. We will make parents/carers aware of what their students are being asked to do online, including the sites we asked them to access. We will always be clear who, from our college (if anyone), a student is going to be interacting with online.

7.8.9 While considering our responsibility to safeguard and promote the welfare of students and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit students' exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. The leadership team and relevant staff, such as online safety lead, will obtain an understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified. We will do this by considering the age range of our students, the number of students, how often they access the IT system and the proportionality of costs versus risks.

7.8.10 The appropriateness of our filters and monitoring systems have been informed in part, by the risk assessment required by the Prevent Duty. To meet this duty, we will work to meet the digital and technology standards. We will:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet safeguarding needs.

7.8.11 We have the appropriate level of security protection in place; in order to safeguard our systems, staff and students, and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

7.8.12 We will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their students face.

7.8.13 Our governing body will question college leaders to gain a basic understanding of our approach to keeping students safe online; learn how to improve this approach where appropriate; and find out about tools, which can be used to improve the approach.

7.8.14 Mentors of trainee teaching staff and newly qualified teachers induct mentees and provide ongoing support, development and monitoring on online safety.

7.8.15 We meet the DfE's Filtering and Monitoring Standards (2023) and conduct an annual review of our systems, including a risk assessment of online access and exposure. In accordance with KCSIE 2026 Annex B, our DSL and Online Safety Lead understand the filtering and monitoring systems in place, are trained to manage them effectively, and know how to escalate concerns appropriately. We ensure our filtering and monitoring provision is proportionate to the risks faced by our students and supports a safe online environment

7.8.16 In line with the Department for Education's Generative AI: Product Safety Expectations (2025), our college recognises the importance of ensuring that any generative AI tools used in school are safe, age-appropriate, and aligned with our safeguarding responsibilities.

7.8.17 We will ensure that:

- AI tools are risk-assessed before use, with particular attention to safeguarding, data protection, and misinformation risks.
- Staff and students are educated on the limitations of generative AI, including the potential for bias, hallucinated content, and inappropriate outputs.
- Generative AI is not used for decision-making about individual students, especially in relation to safeguarding, behaviour, or SEND provision.
- Children's data and intellectual property are protected, and AI tools are only used in line with our data protection and filtering policies.
- AI-generated content is critically evaluated, and students are taught to question the reliability and origin of digital content, including deepfakes and synthetic media.
- Staff are trained to understand the risks and opportunities of AI in education and to model responsible use.

7.8.18 We will only adopt generative AI tools that meet the DfE's safety expectations and will review their use regularly as part of our digital safeguarding strategy.

7.9 Mobile and smart technology

7.9.1 KCSIE 2026 confirms that schools should be mobile phone-free environments by default, with anything other than this by exception only. Telford College adopts the same principle in a way appropriate to a post-16 environment: mobile phones are not used during taught sessions unless a member of staff has directed their use for a specific learning task.

7.9.2 We recognise that many students have unlimited and unrestricted access to the internet via mobile phone networks. This access means some students, while at our college may cause harm to others via their mobile and smart technology, and potentially access other harmful content. To reduce this risk of harm, students are taught about safe and appropriate use of mobile technology as part of the tutorial program. Mobile phone use is not permitted in teaching spaces unless it is explicitly being used for a learning task under the direction of a member of staff.

7.10 Inspection

7.10.1 We recognise our responsibilities for safeguarding within the remit of Ofsted Inspectorate.

7.11 The use of 'reasonable force'

7.11.1 There are circumstances when it is appropriate for staff in our college to use reasonable force to safeguard our young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain young people, students or apprentices. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means us 'using no more than is needed.' Our use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

7.11.2 We will always follow the advice for schools on the Use of Reasonable Force in Schools. We will also have regard to additional guidance Reducing the Need for Restraint and Restrictive Intervention for young people with learning disabilities, autistic spectrum conditions and mental health difficulties in health and social care services and special education settings.

7.11.3 We believe that the adoption of a 'no contact' policy in our college could leave staff unable to fully support and protect our students. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether to or not to use reasonable force to control or restrain a student is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

7.11.4 When using reasonable force in response to risks presented by incidents involving students with SEND, mental health or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

7.11.5 We will plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable students, and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed, in-line with our physical restraint policy.

7.12 Hiring out our facilities and premises

7.12.1 Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extracurricular activities) we will ensure that appropriate arrangements are in place to keep students safe.

7.12.2 When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; and ensure that there are arrangements in place to liaise with us on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this may lead to termination of the agreement.

7.12.3 The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place. This is requested to be confirmed when bookings are made.

7.12.4 In any event where we feel there is reputational risk to our organisation, we will withdraw from any hire agreement of our premises. We will ensure the hirer acknowledges that our college has a duty under Section 26 of the Counter Terrorism and Security Act 2015 in the exercise of its functions to have "due regard to the need to prevent people from being drawn into terrorism" (the "Prevent Duty"). We will ensure the hirer uses our premises in such a way as to satisfy the Prevent Duty. We will take all reasonable steps to ensure our premises are not used by any groups or speakers in support of any extremist ideology.

7.13 Absent from education

7.13.1 We believe young people/students being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Our response to persistently absent students, and students absent from education will support identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a student absent from education in the future. This includes when problems are first emerging but also where students are already known to local authority social care and need a social worker (such as a student who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

7.13.2 The recognised figure for severely absent is 50% or less, although concerns may still be raised if above this. We will use our Positive Behaviour Process to indicate any students absent from education. We will then notify the appropriate agencies. We recognise that students who are not accessing full time education are at greater risk of abuse, neglect and exploitation than other students. We will ensure any students accessing a modified timetable are seen regularly by we staff to help to ensure their safety and welfare. It is our aim that students access modified timetables for limited periods of time and students who are on a child protection, child in need plan and/or have an Education Health Care Plan are not placed on a modified timetable. We will regularly monitor and review the use of modified timetables.

7.13.3 In addition to the above and where reasonably possible we will endeavour to hold more than one emergency contact number for each student. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a student is absent from education and poses a potential welfare/safeguarding concern. Where a student is on a Child Protection Plan has been absent from college for two consecutive days, we will notify the student's allocated social worker.

7.13.4 Where students leave the classroom or leave our grounds without permission during timetabled sessions, this is covered within our Positive behaviour Process and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a young person without parental responsibility may do what is "*reasonable*" in all the circumstances to safeguard and promote the young person's welfare. It is likely to be "*reasonable*" to inform the police, or children's services departments, and, if appropriate, their parents/carers, of the young person's safety and whereabouts'. However, in principle, if a student runs out of class we will establish where they have gone. Staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any student who has taken themselves out of our building and possibly out of our grounds, unless this watchful eye provokes the student to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a student is no longer on the premises, we will contact parents/carers in the first instance.

7.14 Students who need a social worker (Child in Need and Child Protection Plans)

7.14.1 Students may need a social worker due to safeguarding or welfare needs. Students may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A student's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

7.14.2 Local authorities should share the fact a young person has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the student's safety, welfare and educational outcomes.

7.14.3 Where young people, students or apprentices need a social worker, this information will be used by the DSL (or deputies) to inform decisions about safeguarding (for example, responding to unauthorised absence or absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

7.15 Looked after young people and previously looked after children

7.15.1 We recognise that the most common reason for students becoming looked after is as a result of abuse and/or neglect. All staff at our college have the knowledge and skills to keep looked after young people safe. The DSL, DDSL and safeguarding team will hold the details of each student's social worker and the name of the virtual school head in the authority that looks after the student. They are responsible for ensuring all staff have the information they need in relation to a student's looked after status and the student's contact arrangements with birth parents/carers or those with parental responsibility. They will also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

7.15.2 We recognise a previously looked after child potentially remains vulnerable.

7.15.3 When dealing with looked after young people and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard these young people.

7.16 The designated teacher

7.16.1 The governing body appoint **Caroline Welson as the designated teacher** to work with the local authorities to promote the educational achievement of registered students who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of students who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

7.16.2 We will follow the statutory guidance on The Roles and Responsibilities of the Designated Teacher.

7.17 Virtual school heads

7.17.1 As a college, we have an appropriately trained teacher who will take the lead in working with the virtual school head. The teacher works with the virtual school head to discuss how funding can be best used to support the progress of looked after students in the college and meet the needs identified in the student's personal education plan. The teacher also works with the virtual school head to promote the educational achievement of previously looked after students.

7.17.2 We will follow the statutory guidance on Promoting the Education of Looked After Children.

7.17.3 The role of Virtual School Heads includes a non-statutory responsibility to promote the educational achievement of all children in kinship care. We recognise the importance of this role in supporting children living in informal and formal kinship arrangements, who may face additional barriers to education.

7.17.4 We will work with the Virtual School Head in line with the non-statutory guidance 'Promoting the education of children with a social worker and children in kinship care arrangements' to ensure that these students receive appropriate support and that their needs are reflected in our safeguarding and pastoral systems.

7.17.5 The DSL, DDSL, Principal, governors, Director of Additional Needs and Inclusion and senior mental health lead will work with the virtual school head to promote educational attendance, attainment and progress of students with a social worker.

7.17.6 The virtual school head for Telford and Wrekin is **Michelle Salter**.

7.18 Care leavers (post 16)

7.18.1 The DSL/DDSL understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The DSL/DDSL and safeguarding officers will hold details of the local authority Personal Advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

7.19 Students who have special educational needs and disabilities (SEND) or health issues

7.19.1 We recognise that students who have SEND , mental health or physical health conditions can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse and neglect of students in this group. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration,
- being more prone to peer group isolation than other students,
- the potential for students with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

7.19.2 To help address these additional challenges we will provide extra pastoral support for students with SEND. For any reports of abuse involving students with SEND, the DSL (or DDSL) and the Director of Additional Needs and Inclusion will liaise closely.

8 Students who are lesbian, gay, bisexual, or gender questioning

The College will keep this section under continual review and will update procedures in line with any revised statutory guidance, case law, DfE advice or EHRC guidance.

8.1)

8.1.1 In line with KCSIE 2026, we take a cautious and proportionate approach to supporting gender questioning young people. We will work in partnership with parents and carers (unless doing so would place the student at risk), and consider clinical advice and wider vulnerabilities, including mental health and safeguarding risks.

8.1.2 We recognise that a young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other students. In some cases, a student who is perceived by other students to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as those who identify as LGBT.

8.1.3 The Cass review identified that caution is necessary for children and young people questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

8.1.4 It recommended that when families/carers are making decisions about support for gender questioning children and young people, they should be encouraged to seek clinical help and advice.

8.1.5 When supporting a gender questioning young person, we will take a cautious approach and consider the broad range of their individual needs, in partnership with the young person's parents/carers (other than in the exceptionally rare circumstances where involving parents/carers would constitute a significant risk of harm to the young person), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

8.1.6 Risks can be compounded where students who are lesbian, gay, or bisexual lack a trusted adult with whom they can be open. All staff will endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

8.1.7 Our tutorial curriculum includes content on equality, respect for others, and the law. It is inclusive of all students and reflects the diverse backgrounds and identities of our college community, including those who are LGBT. This is in line with the RSHE Statutory Guidance (2025) and the Equality Act 2010.

8.2 Legal Definition of Sex and Equality Act Compliance

8.2.1 In line with the UK Supreme Court judgment (*For Women Scotland v The Scottish Ministers*, 2024) and the Equality and Human Rights Commission's interim guidance (April 2025), we recognise that under the Equality Act 2010, the protected characteristic of "sex" refers to 'biological sex.' This means:

8.2.2 A "woman" is a biological female.

8.2.3 A "man" is a biological male.

8.2.4 A person who identifies as transgender does not change their legal sex for the purposes of the Equality Act, even if they hold a Gender Recognition Certificate.

8.2.5 We will ensure that our safeguarding, curriculum, facilities, and equality practices reflect this legal definition. Where single-sex services or spaces are provided, decisions will be made in accordance with the Equality Act 2010 and relevant statutory guidance, with due regard to the safety, dignity, and privacy of all students. We will continue to support all students with sensitivity and respect, while ensuring compliance with our legal duties under the Equality Act 2010.

8.3 Sport

8.3.1 Telford College is a general further education college within the "further education sector" as defined by the Further and Higher Education Act 1992, and is therefore covered by Part 6 of the Equality Act 2010 in the same way as schools and 16-19 academies. As students get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception for single-sex sport, which applies to competitive activity where the physical strength, stamina or physique of the average competitor of one sex would put them at a disadvantage against the average competitor of the other sex. This means we can separate students according to biological sex in these circumstances without discriminating unlawfully.

8.3.2 Where there are no safety concerns and a student makes a request relating to how they participate in sport, we will consider the request taking into account all relevant factors, including the best interests of the student, the impact on other students, and the aim of creating safe and fair environments for everyone to take part.

8.4 Regulations and safeguarding requirements relating to college premises

8.4.1 Students will not be allowed into toilets, changing rooms or showers designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition. Where a gender-questioning student does not want to use the facility designated for their biological sex, we ensure we have incusive toilets and changing spaces available for one person use and are not assigned or available according to biological sex. We will keep a clear record of any such arrangements, ensure they are communicated appropriately, and review them regularly.

8.4.2 Telford College does not provide boarding or residential accommodation. Where a residential educational visit involves an overnight stay, the same single-sex principles apply to sleeping accommodation, and arrangements are made in line with our Educational Visits Policy.

8.5 Staff

8.5.1 All staff, supply staff, contractors and visitors, are informed of the name of the DSL and DDSL and our procedures for protecting students, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.

8.5.2 Staff should not accept personal invitation visits to the homes of young people, students or apprentices unless permission or instruction has been sought from the Principal/DSL or DDSL and it is viewed as a professional appointment, for example, supporting education welfare issues etc. This should be viewed on a case-by-case basis. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another student or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place', the visit it recorded in their calendar with accurate timings and location details, and they must remain available via telephone..

8.6 Parents/Carers

8.6.1 Parents and carers play an important role in protecting students from abuse. We are required to consider the safety of the student, and should a concern arise, professional advice may be sought prior to contacting parents/carers. If deemed appropriate, parents/carers will be contacted, and we will continue to work with them to support the needs of their young person. Consent from the parents/ carers will be sought, although in exceptional circumstances, and with the best interests of the young person being considered, this may be overridden.

8.6.2 We aim to help parents and carers to understand their responsibility for the welfare of all students which includes their duty to refer cases to social care services and/or police in the interests of the young person. The governing body will include a safeguarding statement in our prospectus, and all parents and carers can view a copy of this policy.

8.6.3 Parents and carers that have concerns regarding a member of staff can in the first instance raise those with the principal. This may involve sharing those concerns with the relevant agencies. Where the parent/carer has concerns regarding the principal, the chair of governors should be consulted in the first instance.

8.6.4 Parents/carers can liaise with Ofsted on such conduct issues or regulatory concerns, advice can be found on its website www.ofsted.gov.uk.

8.6.5 On occasions Ofsted may forward complaints that may raise a safeguarding concern about our college via Family Connect. In such instances, we will work with all agencies within Family Connect to clearly respond to Ofsted on a case-by-case basis.

8.6.6 Parents/Carers can also access Ofsted Parent View which is an online survey questionnaire where parents/carers can give their views. Where possible, this will be monitored regularly by the college to quickly address any concerns.

8.6.7 All complaints should be made via our Quality Team, inline with our Compliment and Complaints Policy.

8.6.8 We will keep parents and carers informed of all areas of safeguarding and child protection through the regular methods of communication.

8.6.9 We wish to make it clear to parents/carers the standards, behaviour and respect we expect from them and conversely from us. If a parent/carer's behaviour is a cause for concern, then we will ask them to leave our premises. We wish to make it clear that in serious cases, the principal can/will notify parents/carers in writing that their implied licence to be on our premises is temporarily revoked, subject to any representations that the parent/carer may wish to make. The college will give parents/carers the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

8.6.10 The college is a private place. We will therefore act to ensure they remain a safe place for all. The public has no automatic right of entry.

8.6.11 We expect parents and carers to talk to us about any concerns they have about care and education provided by us in the first instance. We urge all parents/carers not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

8.7 Changing in College

8.7.1 Telford College consider arrangements for safe changing areas for students studying courses such as Sport, Hair and Beauty, Health, Catering and Engineering etc. We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms. This consideration will come under our duty and remit of health & safety and in the context of students' welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for students; staff supervision; changing areas for students with additional needs; changing considerations for drama productions and using off-site changing rooms. NSPCC factsheet.

9 Applicants and students with criminal convictions or legal restrictions

9.1.1 This section applies to all applicants and current students who disclose a criminal conviction, pending investigation, or a licence, bail or court restriction, or about whom the College otherwise becomes aware of one, where this is relevant to their proposed programme of study or may present a safeguarding, welfare or safety risk. It sits alongside our standalone Safeguarding Risk Assessment Process for Applicants and Learners with Criminal Convictions, Pending Investigations, or Licence, Bail or Court Restrictions (version 2.0, 2026 to 2027), which sets out the full operational procedure, scoring tool and questioning guidance referred to below. This policy summarises the key principles; where the two documents differ, the standalone process document takes precedence on operational detail and this policy takes precedence on underlying principle.

9.1.2 This process reflects our duties under the Rehabilitation of Offenders Act 1974 (as amended) and the Exceptions Order 1975, KCSIE 2026, Working Together to Safeguard Children 2026, and data protection laws (the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025). Each case is subject to an individual and proportionate risk assessment; a conviction or restriction is never, by itself, a reason to refuse a place.

9.2 Trigger and pre-assessment checks

9.2.1 The process is triggered when a conviction, pending investigation, licence, bail or court restriction is disclosed or otherwise comes to light. Before any scoring takes place, pre-assessment checks confirm the application is complete, the programme is identified, and the Learner Manager and Director of Faculty are aware. The Vice Principal is made aware where a serious offence or reputational risk applies, and the Principal where escalation requires it. We also confirm that progression to industry or higher education remains achievable against professional body and legislative requirements, and inform any external delivery partner where relevant.

9.3 Two routes into the assessment

9.3.1 Where the student is already known to us, we review the safeguarding file on CPOMS, any existing plans and previous risk assessments, and multi-agency information already held, including from probation, police, MAPPA, youth justice and children's social care. Where the person is a new applicant not previously known to us, the application is placed on hold as soon as a conviction or restriction is disclosed, the Besafe Team is notified without delay, and information is gathered from scratch and triangulated with any agencies supporting the applicant. In both routes, identified staff complete the questioning guidance using a trauma-informed and restorative approach, and both routes converge on the same safeguarding risk assessment, control planning and residual risk review.

9.4 Scoring, controls and residual risk

9.4.1 All 15 criteria in the assessment tool are scored with evidence recorded against each, including the mandatory escalation flags for factors such as serious violence, weapons, sexual offences, Prevent or Channel involvement. The least restrictive controls that manage the risk are then selected, each with a named lead and start date. The residual risk, the level of risk that remains once controls are applied, rather than the initial score, determines who makes the decision.

9.5 Who decides: escalation by residual risk

- Low or medium: an operational decision. The DSL or DDSL countersigns the assessment and control plan, with the Learner Manager informed, and a review date set, typically 6 to 8 weeks.
- High, without serious violence, weapons, sexual offences, Prevent or Channel features: a joint decision between the DSL and the Director of Faculty, with a written rationale and a review date of 4 to 6 weeks.
- High, involving serious violence, weapons, sexual offences, Prevent or Channel: an asynchronous safeguarding risk panel of a member of the Executive Leadership Team, the DSL, the Director of Faculty and the Learner Manager. All four must record and share their own assessment of the risk independently for the panel to be quorate; a non-response is not agreement.
- Critical, or high with potential reputational risk to the college: a convened panel, held in person, adding the Principal to the panel above.

9.5.1 Panel membership is built by adding members at each escalation level; members are never substituted for a smaller group. Where there is a strong difference of opinion at the asynchronous stage, the panel convenes in person to reach a consensus. The full record, including any disagreement, is retained on CPOMS to demonstrate a defensible decision.

9.6 Equity and inclusion check

9.6.1 Before any decision to decline a place is issued, we ask: would the same decision be reached for a student of a different ethnicity, gender, background or neurotype, on the same evidence? Have the student's own safeguarding needs, including the risk of exclusion from education, isolation and further exploitation, been weighed alongside the risk they may pose? Has the least restrictive option genuinely been considered before a more restrictive one? If the answer to any of these is uncertain, the decision returns to panel.

9.7 Outcome, recording and review

9.7.1 Every decision is recorded with its rationale, the information relied upon, and the controls attached to it, and is communicated to the student, to the parent or carer where the student is under 18, and to relevant agencies as applicable. The DSL shares information with staff only on a need-to-know basis, limited to what a member of staff requires to fulfil their role safely and to implement an agreed control.

9.7.2 Where a place is offered with conditions, written agreement to those conditions is obtained, a named lead is allocated to each control, and the review date is brought forward immediately if circumstances change, new information comes to light, or a condition is breached. Where a place is not offered, this is a decision about a risk that cannot currently be managed, it is not a judgement about the person's worth or future, and the student is signposted to an alternative provider with a named contact wherever possible.

10 Safer Recruitment

10.1.1 We will meet all requirements as set out in Part three: Safer recruitment in KCISE 2026.

10.1.2 We have an internal People Services who manage our Safer Recruitment recruitment procedures.

10.1.3 Please see our safer recruitment procedures as outlined in our Safer recruitment policy.

10.2 Recruitment and selection process

10.2.1 We aim to create a culture that safeguards and promotes the welfare of all young people. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with young people from applying for or securing employment, or volunteering opportunities in our college. We follow the safer recruitment procedures outlined in Part Three of KCSIE 2026, including checks for regulated activity, overseas checks, and recording of vetting information

10.2.2 We will ensure that those involved with the recruitment and employment of staff to work with young people have received appropriate safer recruitment training.

10.2.3 We will ensure that at least two members of staff on each interview panel have completed safer recruitment training in our college.

10.3 Pre-appointment vetting checks, regulated activity and recording information

10.3.1 We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to students. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with young people (and in some cases is legally prohibited from working with young people and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following appointment.

10.4 Other checks that may be necessary for staff, volunteers and others

10.4.1 We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers and governors. We will fulfil our responsibilities in relation to other settings.

468. Volunteers are not be permitted to begin working within our setting until we have received the volunteer's enhanced DBS certificate including barred list information in line with KCSIE 2026, part 3 safer recruitment requirements.

10.5 Visitors

10.5.1 We have different types of visitors, those with a professional role, those connected with the building, grounds maintenance, student's relatives or other visitors attending an activity.

10.5.2 We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as students' relatives or other visitors attending one-off events. The principal will use their professional judgment about the need to escort or supervise such visitors.

10.5.3 For visitors who attend the college in a professional capacity we will check their ID and seek assurance that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). We will not ask to see DBS certificates.

10.5.4 Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us enrich students' education; careful consideration will be given to the suitability of any external organisations.

10.6 Adults who supervise young people on work experience

10.6.1 When organising work experience placements, we will ensure that the placement provider has policies and procedures in place to protect young people from harm.

74. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. We will consider the specific circumstances of the work experience and give consideration in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30- day period, or overnight).
- If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, we may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

10.6.2 We are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. If an activity undertaken by a child on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children.Please see our Work placement policy.

10.7 Private fostering

10.7.1 We recognise that a private fostering arrangement occurs when a young person under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

10.7.2 A student is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of we staff through the normal course of their interaction, and promotion of learning activities, with students.

10.7.3 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement for a student that has not been notified to children's social care, we will encourage parents/carers and private foster carers to notify them and will share information with children's social care as appropriate.

10.8 Our ongoing safeguarding of students and the legal reporting duties on us

10.8.1 We understand the importance of safeguarding vigilance beyond the recruitment process.

10.8.2 We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of students is embedded in all of our processes and procedures and consequentially enshrined in our ethos.

10.8.3 We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

10.8.4 We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of students. This can help assist us as employers to support staff, where there is a need, and help them manage students' safety and welfare. Potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard students in our care.

10.8.5 We will undertake our duty to refer to the Disclosure and Barring Service and to the Teaching Regulation Agency where required.

11 Protective Security and Preparedness

11.1.1 This section outlines how the setting aligns with the Department for Education's guidance on Protective Security and Preparedness for Education Settings (April 2025). Full details of Telford College's Lockdown procedures can be found within the relevant policy. All staff and students are made aware of and given opportunities to participate in practice drills at points throughout the year.

11.2 Embedding a Security Culture

11.2.1 The setting promotes a whole-setting approach to security awareness and preparedness. All staff receive training to identify suspicious activity and understand their role in maintaining a secure environment. Security is embedded within the safeguarding culture and emergency planning processes.

11.3 2. Staff Roles in Protective Security

11.3.1 The college has an Incident Response Team (IRT) who serve as the primary point of contact during major incidents, with each member being assigned specific roles and responsibilities.The Principal is the Designated Security and Incident Lead.

11.3.2 All staff, including non-teaching staff are briefing on their responsibilities in the event of an accident. These roles are defined within the Business Continuity Plan and reviewed annually..

11.4 Tailoring Emergency Plans to the Setting

11.4.1 The emergency plan is tailored to the site layout, student needs, and local risks. Vulnerabilities such as building access, location, and events are considered. Plans are evaluated annually through drills and reviewed following any incidents.

11.5 RUN HIDE TELL Protocols

11.5.1 All staff and students are trained in the RUN HIDE TELL principles. Age-appropriate materials are used to educate students on how to respond to threats. Visual reminders, such as posters, are displayed in key areas.

11.6 Grab Kits

11.6.1 Grab kits are maintained in the college reception and include site maps, contact lists, first aid supplies, high-visibility vests, and emergency communication tools. These kits are checked termly and updated as needed.

11.7 Communication During an Incident

11.7.1 Procedures are in place for internal and external communication during incidents. The Headteacher or a designated deputy consults with emergency services and the local authority. Parents/carers are informed via the emergency communication system.

11.8 Post-Incident Welfare and Review

11.8.1 Welfare support is provided to students and staff following incidents, including access to counselling. A post-incident review is conducted to evaluate the response and update plans. Lessons learned are shared with staff and governors.

11.9 Training and Resources

11.9.1 Staff at Telford College are committed to developing their safeguarding knowledge and practice as part of their ongoing professional CPD. Staff complete the IHASCO for Education e-learning module and are required to read at least part one of Keeping Children Safe in Education annually. Telford College uses the Protective Security and Preparedness self-assessment tool to review readiness. Staff receive regular safeguarding updates and development opportunities, which include security preparedness.