PROCEDURE

Document Title	**Safeguarding Children and Adults at Risk Procedure**
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Approved by	**Board of Corporation**
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Lead responsibility	**Assistant Principal – Curriculum & Quality**

1. Purpose

1.1. The purpose of this procedure is to safeguard and protect the welfare of all our learners and to help to encourage all staff to achieve and maintain the highest standards of Safeguarding Children and Adults at Risk.

1.2. Safeguarding and promoting the welfare of children is everyone's responsibility. "Everyone who encounters children, their families and carers have a role to play in safeguarding" (Keeping Children Safe in Education) (KCSIE 2026).

2. Scope

2.1. This procedure applies to all employees of Derwentside College. The College has an important role to play in helping to promote and safeguard the welfare of children and adults at Risk to help protect them from abuse.

3. Key Definitions and Concepts

3.1. This procedure applies to all learners and is in place to ensure that children and adults at risk are protected from all forms of abuse; definitions of which are detailed in our Safeguarding Children and Adults at Risk Policy.

3.2. All complaints and allegations or suspicions will be taken seriously and in accordance with both our policy and this procedure.

3.3. Safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between children and adults at risk outside the College. All staff, but especially the Safeguarding Lead (DSL) or Deputy should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

3.4. College staff who have regular contact with learners are well placed to observe significant changes in a learner's behaviour, a failure to thrive or outward signs of abuse. In addition, children and adults at risk may choose to share their concerns with staff whom they feel they can trust and with whom they are comfortable. Staff need to know how to respond sensitively to a learner's concerns and whom to approach for advice.

3.5. Any staff member who has concerns about a young person under the age of 18 living outside of the family home and who is being provided with care and accommodation by someone who they are not related to should inform the DSL. The concerns may extend to 'informal fostering' or host family provision.

3.6. The College has developed a dedicated intranet portal for aiding staff and learners understanding safeguarding and prevent. The link is https://www.derwentside.ac.uk/safeguarding-hub/

4. Responding to Disclosure and Allegations of Abuse, Neglect and Exploitation

4.1. The College has a number of well-promoted channels for learners to refer or report a concern. This extends to a specific email address and online link to help when a learner might not want to approach a member of staff in the first instance.

These contact details are as follows:

Email: Noexcuseforabuse@derwentside.ac.uk or scan

4.2. Where there is a safeguarding concern, the College will, as far as possible, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

4.3. Whilst College staff are not responsible for investigating abuse, neglect and exploitation, it is essential that any suspicions of significant harm or allegations are promptly recorded and acted upon and are treated seriously.

4.4. Where a member of staff has any concerns about the risk of possible or actual radicalisation of an individual, then they are required to report this immediately to a Designated Safeguarding Lead (DSL) or Deputy.

4.5. The DSL or Deputy will then refer the concern via CHANNEL, which uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism. The DSL or Deputy will assess the nature and extent of that risk and develop the most appropriate support for the individual/s concerned.

4.6. The College provides guidance to all staff and learners on the key contact details for additional support.

4.7. A member of staff receiving a Disclosure must:

- take all allegations or suspicions of abuse seriously;
- respond with tact and sensitivity to anyone who confides in you;
- stay calm and reassure the learner that they are right to tell someone of their concerns;
- reassure the learner that it is right to speak to someone;
- inform the learner that information will be passed on to whom, and why (i.e. the appropriate person in College who will seek further advice and help);
- ensure tact and diplomacy and discretion (only the people who need to know will be told);
- allow the learner to speak freely in their own way and time and at their own pace;
- avoid interrupting when the learner is recalling significant events;
- only clarify what the learner is trying to say and ascertain whether there are any immediate issues of safety for the learner or any other learner(s);
- take notes as accurately as possible of what was said, use the learner's own words; do not interpret.

4.8. **Key information to note when receiving a Direct Disclosure**

4.8.1 Include the time, context and location of the disclosure. Please record the following information about the learner:

- Name
- Address
- Date of Birth
- Telephone Contact
- College Course, if known
- Date and sign the notes

4.8.2 Please keep a written record of the conversation. These notes should be taken at the time of disclosure. Report as soon as practicable (or within the hour) to a Designated Safeguarding Officer and ensure all notes and further information are passed over to the DSL or Deputy.

On receiving a disclosure, you must not:

- promise confidentiality (only those who need to know will be told);
- make judgements;
- investigate the allegation or suspicion of abuse;
- ask leading questions or probe for details (this may jeopardise future investigations);
- interpret what has been said or make assumptions/judgements about the situation;
- contact parents/carers before seeking advice;
- talk to the alleged perpetrator(s) or pass on any information about the learner.

4.9 **Actions following a Disclosure**

4.9.1 You must make sure the learner is safe and then contact one of the College's Designated Safeguarding Officers immediately:

Colleen Sawicki (DSL)
Head of Education Programmes for Young People
01207 585 900 (Ext. 928)
Colleen.Sawicki@derwentside.ac.uk

Karen Hankey (Deputy DSL)
Curriculum Leader – Student Services
01207 585900 (Ext. 728)
Karen.Hankey@derwentside.ac.uk

Julie Eddy (Deputy DSL)
SEND Lead
01207 585900 (Ext. 605)
Julie.Eddy@derwentside.ac.uk

4.9.2 If, at any point, there is a risk of serious harm to a person, a referral should be made to First Contact immediately (03000 267 979). If the risk is immediate and serious then a police referral can be made (999). If the person's situation does not appear to be improving, the staff member with concerns should press for reconsideration. Concerns should always lead to help for the person/child at some point.

4.9.3 All written information and rough notes will be retained by the Designated Safeguarding Lead or Deputy. The rationale for making (or not making) the referral should be recorded and retained as part of the overall information gathering process. Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and outcome

4.9.4 Where there are serious concerns of 'significant harm' the Designated Safeguarding Lead will refer *immediately* to First Contact or the Police.

4.9.5 Any actioned safeguarding concerns will be followed up by our Designated Safeguarding Lead with the learner and records of the information stored securely for future reference.

4.9.6 The Designated Safeguarding Lead will co-ordinate any requests for information which will contribute to an assessment of the learner and agree monitoring and follow-up arrangements as appropriate.

4.9.7 When a young person, who is subject to a Child Protection Plan, leaves College the Designated Safeguarding Lead will inform the new education establishment and arrange the

transfer of appropriate information to the appropriate Designated Safeguarding Lead.

4.9.8 When an alleged perpetrator and victim are both college learners, there will be difficult and complex decisions for the DSL to make including how to best support both the alleged perpetrator and victim while instigating the disciplinary process. This will be much more complex if a police investigation is ongoing. Any such instance will be considered on a case-by-case basis and every effort made to keep both parties as far apart as possible. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, we will be guided by the Police, and the alleged perpetrator(s) will be kept away from the alleged victim.

4.9.9 Where a criminal investigation into a rape or assault by penetration or sexual assault leads to a conviction or caution, the College will instigate the discipline and behaviour policy with the offence likely to constitute gross misconduct leading to a permanent exclusion. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

4.9.10 Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the Police and the case is not progressed or are reported to the Police and ultimately result in a not guilty verdict. This does not mean the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support will be provided to both as required and consideration given to how attendance at College will be managed.

4.9.11 All of the decisions made through the procedure will keep the needs and wishes of the victim at the heart of the process (supported by parents and carers as required).

5. Child on child sexual violence and sexual harassment

5.1 Sexual violence and sexual harassment can occur between two or more people of any age and sex. It can also occur through a group sexually assaulting or sexually harassing a single person or group. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable.

5.1.1 Following a disclosure or allegation an assessment of the incident between children should be completed and consider:

- chronological and developmental ages of everyone involved;
- difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability;
- all alleged physical and verbal aspects of the behaviour and incident;
- whether the behaviour involved inappropriate sexual motivation;
- what was the degree of physical aggression, intimidation, coercion, threatening behaviour or bribery
- the effect on the victim;
- any attempts to ensure the behaviour and incident are kept a secret;
- the child's motivation or reason for the behaviour, if they admit that it occurred;
- whether this was a one-off incident, or longer in duration.

5.1.2 It is important to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the full facts. Avoid language that may create a 'blame' culture and leave a young person labelled. Staff will talk to the learner in a calm and consistent manner. Staff will not be prejudiced, judgmental or dismissive in dealing with such sensitive matters.

5.2 Recording sexualised behaviour

- Be clear, explicit and non-avoidant, avoiding vague statements or euphemisms
- Record as soon as possible, as you can quickly forget or confuse detail
- Follow the prompts on the disclosure reporting form

- Use proper names for body parts but record exactly any language or vocabulary used by the learner. Use the learner's exact words in quotation marks
- Note where and when the incident happened and whether anyone else was involved or around

5.2.1 All children involved will be spoken to separately, to gain a statement of facts from them. It is important that consistent language and open questions are used for each account. The children should be asked to explain what happened using open questions, 'where, when, why, who'. Do not interrogate or ask leading questions.

5.3 Consider the Intent

5.3.1 Has this been a deliberate or contrived situation for a young person to be able to harm another?

5.4 Decide on the next course of action

5.4.1 If it is believed any young person to be at risk of harm it must be reported to the Designated Safeguarding Lead or Deputy immediately; they will follow the College's Safeguarding Policy.

5.4.2 If Social Services and the Police intend to pursue this further, they may ask to interview the children in College or if they are informed, they may ask for parents to come to College to be spoken with.

5.5 Taking Action

- Complaints will always be taken seriously
- A statement of facts will be gained from the children
- Assessment of the needs of the victim and alleged perpetrator
- Referral to Police or Social Care will be considered
- Staff will contribute to multi-agency assessments
- A risk management meeting will take place
- Records will be kept of all incidents and all action taken

5.6 Informing parents/carers

5.6.1 When possible if parents/carers are to be informed, it should be done face to face. The nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who has harmed another.

5.6.2 In all circumstances where the risk of harm to the child is evident, and where it will not contribute to further harm, the College will encourage the young person to share the information with their parent/carer.

5.7 Next Steps

5.7.1 Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consideration should be given to the support and intervention required for those involved.

5.8 For the young person who has been harmed

5.8.1 In the case where a police or social care referral has not been deemed appropriate, the level of support required depends on the individual child. It may be that they wish to seek counselling or one-to-one support via a Student Progression Coordinator. It may also be that they feel able to deal with the incident(s) on their own or with the support of family and friends; in which case it is necessary that this child continues to be monitored and offered support should they require it in the future.

5.8.2 If a police or social care referral has taken place a similar approach will be taken, with consideration of any advice and guidance provided by those agencies.

5.9 For the child who has displayed harmful behaviour

5.9.1 In the case where a police or social care referral has not been deemed appropriate, it is important to find out why the child has behaved in such a way. It may be that the child is experiencing their own difficulties and may even

have been harmed themselves in a similar way. In such cases, support such as one-to-one mentoring or wellbeing support may also be necessary. Particular support from identified services may be necessary and the young person may require additional support from family members.

5.9.2 Once the support required to meet the individual needs of the child has been met, it is important that the child receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the child they have targeted if this has been some form of bullying. In the case of sexually harmful behaviour, it may be a requirement for the child to engage in one-to-one work with a particular service or agency; if a crime has been committed this may be through the Police or Youth Offending Service. If there is any form of criminal investigation ongoing, it may be that this child cannot be educated in College until the investigation has concluded. In which case, the child will need to be provided with appropriate support and education outside of College.

5.9.3 It may be that the behaviour that the child has displayed may continue to pose a risk to others, in which case an individual risk assessment will be required. This will be completed via a multi-agency response to ensure that the needs of the child and the risks towards others are measured by all of those agencies involved including the child and their parents. This may mean additional supervision of the child or protective strategies if the child feels at risk of engaging in further inappropriate or harmful behaviour.

5.9.4 The College may also choose a punishment as a consequence; such as exclusion for a period to allow the young person to reflect on their behaviour.

5.9.5 Where a criminal investigation leads to a conviction or caution, the College will instigate the discipline and behaviour policy with the offence likely to constitute gross misconduct potentially leading to a permanent exclusion, as allowing the perpetrator(s) to remain in College would seriously harm the education or welfare of the victim (and potentially other learners). The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

5.9.6 Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the Police and the case is not progressed or are reported to the Police and ultimately result in a not guilty verdict. This does not mean the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support will be provided to both as required and consideration given to how attendance at College will be managed.

5.10 After Care

5.10.1 It is important that following the incident, the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. It is important to ensure that the children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping. For this reason, regular reviews with the children following the incident(s) are imperative.

5.11 Confidentiality and Anonymity

5.11.1 Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

5.11.2 The College will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

5.11.3 The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. In these circumstances, staff guidance should be sought from the designated safeguarding lead (or deputy), who will consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk);
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police.

5.11.4 Ultimately, the designated Safeguarding Lead (or a Deputy) will balance the victim's wishes against the duty to

protect the victim and other children. If the Designated safeguarding Lead (or Deputy) decide to go ahead and make a referral to Local Authority children's Social Care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, with the reasons explained to the victim and appropriate specialist support offered.

5.11.5 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the College will seek to maintain anonymity and offer support for those involved. This will mean careful consideration regarding the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

5.12 Risk assessment

5.12.1 When there has been a report of sexual violence, the Designated Safeguarding Lead (or Deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);
- all the other children, (and, if appropriate, adult students and 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.

5.12.2 Risk assessments will be recorded (paper or electronic) and will be kept under review. At all times, the College will actively consider the risks posed to all learners and put adequate measures in place to protect them and keep them safe.

5.12.3 The Designated Safeguarding Lead (or Deputy) will engage with Local Authority Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The College risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the College approach to supporting and protecting learners and updating the risk assessment.

5.13 Preventative Strategies

5.13.1 Child on child abuse can and will occur even with the most robust policies and support processes. It is important to continually review and develop appropriate strategies to proactively prevent child on child abuse.

5.13.2 The College endeavours to have an open environment where children and adults at risk feel safe to share information about anything that is upsetting or worrying them. There is a strong and positive tutorial programme that tackles such issues. The College makes sure that reporting and support signposting is available to children and adults at risk.

5.13.3 Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action.

6 Supporting SEND Learners

6.1. Evidence on the extent of abuse among children and adults at risk with learning difficulties and disabilities suggests that some may be especially vulnerable to abuse and it is also recognised that extra barriers exist when recognising abuse and neglect in this group of children, for example, those who have difficulty communicating.

6.2. Those working with children and adults at risk with special educational needs and/or disabilities often provide close support and may encounter indications of possible abuse.

6.3. Whilst extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in the same manner as for other children and adults at risk. The College recognises the additional challenges these learners face and to ensure these challenges do not become barriers, additional learning and wellbeing support is in place along with a specific member of staff (SEND Lead) with

responsibility for overseeing the welfare, educational progress and support of these learners.

6.4. In any instance, as a result of dealing with safeguarding and supporting learners both the learner, and if required, the member of staff to whom the disclosure was made can access support from the College's SEND Lead and Student Progression Coordinators.

7 Dealing with Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

7.1 In addressing allegations of abuse made about staff, the College will seek to ensure compliance with the prevailing guidance from the Local Safeguarding Children Board, Durham Safeguarding Adults Board, Disclosure and Barring Service, United Kingdom employment legislation, laws of natural justice and its own internal procedures. Where a concern or allegation relates to an agency member of staff, the supplying agency will be kept fully informed and involved through the process.

7.2 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 children, then:

- this should be referred to the Principal;
- where there are concerns/allegations about the Principal, this should be referred to the Chair of Governors;
- in the event of concerns/allegations about the Principal or in a situation where there is a conflict of interest in reporting the matter to the Principal, this should be reported directly to the Local Authority Designated Officer (LADO).

7.3 Particular attention will be given to Part Four of Keeping Children Safe in Education September 2026. Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors. The following arrangements relate to all staff, external agency and volunteers working at Derwentside College.

7.4 Low Level Concern

7.4.1 Low-level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of h a r m . A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that:

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

7.4.2 Low-level concerns could include, but are not limited to:

- being overfriendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

7.4.3 We encourage and support staff to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might seem compromising to others, and on reflection feel they have behaved in such a way that falls below the expected professional standards of the College.

7.4.4 We encourage staff to record all low-level concerns, even those causing a sense of unease, to ensure patterns of behaviour are identified early.

7.5 Initial action by the person receiving or identifying an allegation or concern

7.5.1 The person to whom an allegation or concern is first reported should treat the matter seriously, keep an open mind and follow the steps in this procedure. they must not:

- investigate or ask leading questions if seeking clarification; make assumptions or offer alternative explanations;

- promise confidentiality (but should give assurance that the information will only be shared on a 'need to know' basis).

They must:

- make a written record of the information (where possible in the persons' own words) including the time, date and place of incident(s), persons present and what was said;

- sign and date the written record;

- immediately report the matter to the Principal and Chief Executive, or in their absence a member of the College's Executive Team;

- report the allegation to the Chair of the Board of Corporation if the allegation is about the Principal and Chief Executive.

7.6 Initial Action by the Principal and Chief Executive

7.6.1 The Principal and Chief Executive will follow the LSCB procedures (outlined below) if there is a concern or it is alleged that a member of staff has:

- behaved in a way that has harmed or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child/or children and Adults at Risk in a way that indicates they are unsuitable to work with children or and Adults at Risk.

7.6.2 The Principal and Chief Executive will not investigate the matter nor interview the member of staff, person concerned nor potential witnesses.

They will:

- obtain written details of the concern/allegation, signed and dated by the recipient (not the child making the allegation);
- countersign and date the written details;
- record any information about times, dates and location of incident(s) and names of any potential witnesses;
- record discussions about the child and/or members of staff, any decisions made and the reasons for those decisions;
- report to the Local Authority Designated Officer (01207 588247) as soon as practicable (e.g. the same day);
- consult the Emergency Duty Team through First Contact (03000 267 979) or local police if the allegation requires immediate attention but is received out of hours, then inform the Local Authority Designated Officer as soon as practicable.

7.7 LADO Initial Consideration

7.7.1 The Local Authority Designated Officer (LADO) will discuss the matter with the Principal and Chief Executive and where necessary obtain further details of the allegation and the circumstances in which it was made. The discussion should also consider whether there is evidence or information that establishes that the allegation is false or unfounded, but the College will not instigate any investigation into the allegation at this stage.

7.7.2 However, this does not preclude the College from considering and actioning suspension from duty

for the member of staff whom the allegation has been made against. If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the Local Authority Designated Officer will immediately refer to Children's Care and ask for a Strategy Discussion in accordance with Working Together to Safeguard Children to be convened straight away. In those circumstances the Strategy Discussion should include the Local Authority Designated Officer and Principal and Chief Executive.

7.7.3 If there is not cause to suspect that "significant harm" is an issue, but a criminal offence might have been committed, the Local Authority Designated Officer should immediately inform the police and convene a similar discussion to decide whether a police investigation is needed.

7.7.4 Where it is determined that a criminal offence might have been committed, the College may suspend its internal discipline investigation, until a conclusion is reached by the Police/Crown Prosecution Service (CPS).

7.7.5 If the Police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the Police should wherever possible aim to pass all information they have which may be relevant to a disciplinary case to the College within three working days of the decision.

7.7.6 If the person is convicted of an offence, the Police should also inform the College Principal and Chief Executive immediately so that appropriate action can be taken.

7.8 Action following initial LADO Consideration

7.8.1 Where the initial consideration decides that the allegation does not involve a criminal offence the College will consider the matter under its prevailing discipline procedure. In such cases, if the nature of the allegation does not require formal disciplinary action, the College will institute an appropriate response/action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held as soon as practicable.

7.8.2 Where further investigation is required to inform consideration of disciplinary action the College's lead Human Resources professional will discuss who will undertake that with the Local Authority/Designated Officer. The investigation will seek to be concluded as soon as practicable, resulting in a formal report for the consideration of the Principal and Chief Executive.

7.8.3 Within two days of receipt of the report of the disciplinary investigation, the Principal and Chief Executive will consult the Local Authority Designated Officer and determine if a *prima facie* case exists in relation to the allegations and whether a disciplinary hearing is needed. In all cases in which Children's Care has undertaken enquiries to determine whether the child needs support, the College will take account of any relevant information obtained during those enquiries when considering disciplinary action.

7.8.4 If it is determined that a disciplinary hearing is needed it should be held as soon as practicable. The Local Authority Designated Officer will provide advice or support when required or requested. The disciplinary hearing will be held in accordance with the College's prevailing policy.

7.9 Referral to Disclosure and Barring Service (DBS)

7.9.1 There is a legal requirement for the College to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- Engaged in relevant conduct in relation to children and/or adults, and/or
- Satisfied the harm test in relation to children and/or vulnerable adults, and/or
- Been cautioned or convicted of a relevant offence.

7.9.2 The Principal and Chief Executive Officer, in conjunction with the Local Authority Designated Officer will consult the detailed guidance (Making barring referrals to DBS – GOV.UK) and decide if they have sufficient information to meet the referral duty criteria. Where this is the case, the referral will be made as soon as possible, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed, or when they have

resigned.

8 Information Sharing

8.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect, exploitation, and in promoting children's and adults at risks' welfare, including their educational outcomes. The College has powers to share, hold and use information for these purposes (KCSIE 2026). The College will proactively share information to help identify, assess, and respond to risks or concerns about the safety and welfare of children and adults at risk. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of Keeping Children and adults at risk safe and the College will not allow concerns about sharing information stand in the way of safeguarding and protecting children and adults at risk.

9 Guests and Visiting Speakers

9.1 The College is subject to legislation and statutory guidance relating to safeguarding children and adults at risk and advancing equality of opportunity. The College reserves the right to monitor any activity associated with the College or delivered on its premises, to ensure that it supports the College values and behaviours. The Prevent duties identified in the Counter Terrorism and Security Act 2015 require that the College has oversight of the content of any speeches or presentations by visiting guests/ speakers.

9.2 Teaching staff will initially use their professional judgement to assess the educational value and appropriateness of any proposed visits. If they believe it to be appropriate and would add value to the social or educational experience of the learners, they will seek approval for the visit by following the procedure set out in the Guest/ Visiting Speaker Request Form.

10 College visitors, contractors and building use for 'non-college' activities

10.1 All College visitors must report to reception on arrival and sign in with the reception team on each visit. Visitors who are visiting in a professional capacity should provide ID for review. The member of College staff responsible for arranging the visit is responsible for the appropriate level of supervision whilst the visitor is on the College site.

10.2 Any Contractor, or any employee of the contractor, who is to provide a service to College will be subject to the appropriate level of DBS check in line with the nature of their work and assurance of this must be provided to the Head of Estates and Facilities prior to their arrival on site. Through our Contractor Induction process, College safeguarding requirements will be outlined. Contractors visiting the College estate to provide services, must report to reception on arrival and sign in with the reception team on each visit. Contractors must provide ID for review on arrival at College. Under no circumstances should a contractor on whom no checks have been obtained, be allowed to work unsupervised or engage in regulated activity relating to children.

10.3 When College facilities are rented out to organisations or individuals (e.g. community groups, sports associations, etc) appropriate arrangements should be in place to keep children safe.

10.4 Where the service or activities are provided separately by another body, assurance should be sought to ensure the organiser has appropriate safeguarding and child protection policies in place. In particular, the organiser should have:

- a designated safeguarding lead (DSL) appointed who has undertaken safeguarding and child protection training;
- an awareness of the specific safeguarding issues that can put children at risk of harm and undertake appropriate training;
- undertaken a regular review of performance and suitability of staff and volunteers after appointment.

10.5 This applies regardless of whether or not the children or adults at risk attend the College or not.

10.6 The College should ensure that safeguarding requirements are included in any transfer of control agreement (ie lease or hire agreement), as a condition of use and occupation of the premises and that failure to comply with this will lead to termination of the agreement.

11 Relevant Legislation / Regulation

11.1 The following legislation and regulations apply to this procedure:

- The Children Act 1989 and Children Act 2014
- The Education Act 2002 and Education Act 2011
- The Education (Health Standards) (England) Regulations 2003;
- The Further Education (Providers of Education) (England) (Regulations) 2006;
- Safeguarding Vulnerable Groups Act (2006);
- The Care Act 2014;
- Children and Social Care Act 2017;
- Data Protection Act 2018;
- GDPR Act 2018;
- UK General Data Protection Regulations 2021;
- The Equality Act 2010;
- The Counter-Terrorism and Security Act 2015
- The Data (Use and Access) Act 2025
- The Crime and Policing Act 2026, where relevant to safeguarding and regulated activity
- Domestic Abuse Act 2021;
- Sexual Offences Act 2023.

The following government guidance is relevant to this policy:

- Working Together to Safeguard Children (2026);
- Keeping Children Safe in Education (September 2026);
- The Prevent Duty Guidance: England and Wales 2023
- What to do if you are worried a child is being abused (2015);
- KCSIE 2026 guidance on children who are questioning their gender and single-sex spaces;
- Relevant current statutory guidance and legislation relating to mandatory reporting and child sexual abuse;
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfE, updated 2024);
- Statutory guidance relating to the information-sharing duty for safeguarding children (in force from September 2026).

12 Related Documents

12.1 The following related documents are relevant to this policy / procedure:

- Health and Safety Policy
- Safe Use of IT Policy
- Online Safety and Remote Learning Policy;
- Staff Development Policy
- Safeguarding Children and Adults at Risk Policy
- Safe Recruitment of Staff Policy
- Learner Behaviour and Discipline Policy
- Staff Disciplinary Procedure
- Attendance and Punctuality Policy

13 Accountability

13.1 The Assistant Principal – Curriculum & Quality is responsible for the drafting and implementation of this procedure.

13.2 They also responsible for ensuring that this document is regularly reviewed and updated –and is the first contact point for managers seeking advice and guidance about the Safeguarding Children and Vulnerable Adults Procedure or making enquiries about its interpretation.

13.3 All managers are responsible for ensuring that they and their team members follow the requirements set out in this document.

13.4 All employees are responsible for adhering to the requirements set out in this document.

14 Equality & Diversity

14.1 The College has paid due regard to equality considerations during the preparation and implementation of this procedure.

14.2 These considerations included the potential for any differential negative effect on the grounds of age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage or civil partnership.

14.3 The College's judgement is that there is no such negative effect on those grounds and, consequently, no potential breach of the Equality Act 2010.

14.4 The operation of this Policy and Procedure will be monitored by the Director of HR to establish that no unlawful discrimination is taking place and to identify opportunities for the College to enhance equality of opportunity and fair treatment.

15 Review

15.1 This document will be reviewed by September 2027.

15.2 The Assistant Principal – Curriculum & Quality will undertake this review, taking into account the outcomes of the monitoring process, legislative changes and developments in good practice.

15.3 As part of the review, the Assistant Principal – Curriculum & Quality will seek and consider the views of the College's employees via the Safeguarding Committee.

15.4 The outcome of the review will be reported to the Executive Team.

16 Document Identification

Category [select ONE only]	☐ Programmes/courses ☐ Partnerships ☐ Finance ☐ Quality ☐ Governance ☒ Health and safety ☐ Facilities ☐ IT and Innovation ☐ MIS ☐ Admissions ☐ Teaching and learning ☐ Human Resources
Audience [select ALL that apply]	☒ Employees ☒ Learners ☒ Partners ☒ Suppliers

EQUALITY IMPACT ASSESSMENT

This form must be completed when drafting a new policy/procedure or amending an existing policy/procedure. It should be completed at the earliest opportunity so any issues can be resolved/mitigated in advance.

POLICY / PROCEDURE DETAILS	
Name of policy / procedure:	Safeguarding Children and Adults at Risk Procedure
Version:	**6.0**
Date of latest version:	1st September 2026
Manager responsible:	Alex Muir
Others involved in this EIA:	Susan Errington

ASSESSMENT			
What evidence have you used? (This could be internal data, surveys, complaints/grievances or other external quantitative or qualitative research)	The previous version of the policy was used as well as changes identified in Keeping Children Safe in Education (2026)		
Who have you engaged / consulted with? (This could be individuals, groups, networks or organisations)	Susan Errington (Deputy Principal), Ian Oyston (Information Technology Manager)		
For each protected characteristic, does the evidence show that the policy/procedure…	does not inadvertently disadvantage or discriminate against staff, learners or service users?	actively explores opportunity and fosters good relations between people of different protected groups and backgrounds?	Where 'no' is checked, or concerns have been identified detail them here:
Age (including older and younger people)	Yes ☒ No ☐	Yes ☒ No ☐	
Disability (including those with physical disabilities, unseen disabilities and mental health issues)	Yes ☒ No ☐	Yes ☒ No ☐	
Sex (both men and women)	Yes ☒ No ☐	Yes ☒ No ☐	
Gender reassignment or Gender identity (including trans staff and students who have transitioned, are considering transitioning or are in the process of transitioning from one gender to another, and also non-binary staff and students who do not identify with, or reject gender labels)	Yes ☒ No ☐	Yes ☒ No ☐	
Marriage and Civil Partnership	Yes ☒ No ☐	Yes ☒ No ☐	

Pregnancy / Maternity (including breastfeeding mothers)	Yes ☒ No ☐	Yes ☒ No ☐	
Race and Ethnicity (including nationality, colour, native language, culture and geographic origin)	Yes ☒ No ☐	Yes ☒ No ☐	
Religion and belief (including those with no religion or belief)	Yes ☒ No ☐	Yes ☒ No ☐	
Sexual orientation (including, but not limited to, gay, lesbian, bisexual, queer and straight staff and learners)	Yes ☒ No ☐	Yes ☒ No ☐	
Intersectionality (although not a protected characteristic itself it's important to consider how characteristics intersect)	Yes ☒ No ☐	Yes ☒ No ☐	

ACTION PLANNING		
Issue Identified	Planned or completed remedial action	Person responsible and timeframe

MONITORING AND REVIEW
How will the impact of your policy and procedure be monitored and reviewed once agreed?
The procedure will be reviewed in light of any safeguarding issues identified but will be formally reviewed in September 2027.

AUTHORISATION		
	Signature	Date
Manager responsible:	Alex Muir	1st September 2026
EIA Panel:		
EIA Committee's Comments if applicable:		