

Safeguarding Policy & Procedure

2026/27

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CONTENTS

		Page
1	Useful Contacts and Introduction	3
2	Definitions	6
3	Accountability	12
4	Role and Responsibilities of Staff	14
5	Role and Responsibilities of Designated Safeguarding Lead	14
6	Role and Responsibilities of Governing Body	16
7	Early Help	17
8	Responding to a disclosure or suspected abuse	17
9	Confidentiality	19
10	Recording, Maintenance and Transfer of Records	20
11	Allegations Management	20
12	Whistleblowing	22
13	Proactive Safeguarding	23
14	Safeguarding Young People who are Vulnerable to Extremism	24

Appendix		
1	Sefton Levels of Need including the CHAT/FAST	26

USEFUL CONTACTS

- Safeguarding main line – 01704 39 2821
- Stephen Musa, Deputy Principal and Designated Safeguarding Lead – 01704 530601 ext. 1635
- Elaine Small and Susannah Porter – Designated Safeguarding Governors
- Liz Jones, Director of Learner Wellbeing and Organisational Safeguarding Lead – 01704 39 2759
- Karen Marsh- Learner Wellbeing Manager / Senior Mental Health Lead / Deputy Designated Safeguarding Lead - 01704 39 2758
- Jodie Marcucci/Anne-Marie O'Donovan/Heather Jamieson- Learner Wellbeing Officers 01704 39 2886/2713/2602
- Alison McDowell – Assistant Principal of People and Culture 01704 39 2861
- Vickie Hayes- Director of Learning Support and Inclusion 01704 39 2872
- Rachael Brownhill – Assistant Principal of Learner Development and Careers 01704 39 2811
- Nicola Vernon- Counsellor 01704 39 2720
- Joanne Dawson/Emily Driver- Student Welfare Officers 01704 39 2746/39 2774
- Declan Sammin, Merseyside Prevent Engagement Officer 07394 559107
- Tracey Holyhead/Vicky Lowndes, Sefton LADO, 0151 934 3783
- Sefton CHAT (Childrens Health and Advice Team), 0151 934 4013
- Sefton FAST (Early Help), 0151 934 4545
- Sefton Adult Social Care, 0151 934 3737
- CAMHS Crisis Sefton, 0151 293 3577

1. INTRODUCTION

- 1.1 The policy and procedures apply to all students, staff, and those working in or on behalf of the college in a paid or unpaid capacity (i.e. members of staff, including supply teachers, volunteers, contractors and organisations using our premises). This Policy has been reviewed in preparation for the publication of Keeping Children Safe in Education 2026. The Governing Body commits to a full statutory compliance review upon final publication.
- 1.2 The policy and procedures are intended to safeguard all students under the age of 18 years and vulnerable adults. In respect of adults, there is a different legislative and policy basis for responding to their safeguarding needs. However, some of the principles and procedures that apply are the same for safeguarding young people.
- 1.3 The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of students; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those who are suffering, or likely to suffer, harm.
- 1.4 This policy aims to establish a “whole College” approach to Safeguarding, the definition of Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

The College endeavours to embrace and embed trauma informed approaches. It is vital; that any approach to whole college behaviours ensures that there is a calm and safe learning environment that supports good quality outcomes for learners. When learners feel safe and their words, thoughts and action are valued they develop a sense of belonging. We want our learners to feel, welcomed, respected, included and supported. To embed this approach, we will ensure that all relevant staff attend on going CPD and the relevant Policies and Procedures are amended:

- Adverse Childhood Experiences (ACES)
- Attachment Awareness
- Emotion Coaching
- Nurture
- Resilience
- Restorative Practice
- Trauma Informed

The COVID-19 pandemic caused unprecedented disruption in learners' lives, potentially unsettling their emotional, and social development. Many known risk factors for mental health disorders have intensified and access to sources of support has reduced. Research has demonstrated that investing time and resources into improving relationships in colleges leads to positive outcomes around inclusion, engagement, attainment and achievement in the short term and community safety and cohesion in the longer term.

- 1.5 The College will endeavour to prevent abuse and neglect by ensuring that the ethos and atmosphere of the College are conducive to a safe environment. Students and parents/carers should feel supported and able to report safeguarding concerns to any member of staff. Staff should feel that they are supported by colleagues and the senior management team and the governing body and can report and seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves. The College remains vigilant around all concerns raised including low-level concerns.
- 1.6 Safeguarding young people and adults will be reflected throughout the curriculum.
- 1.7 As part of our safeguarding ethos, the College encourages students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The College ensures that prejudicial views are not promoted in the teaching of any subject in the College and, where issues are brought to the attention of the students, reasonable practical steps will be taken to offer a balanced presentation of opposing views to students.
- 1.8 The College will protect students at risk of abuse, neglect and exploitation by having safeguarding procedures in place that reflect current legislation, guidance and best practice. The College also ensures that safer recruitment practices are followed when recruiting staff

at all levels across the College, including volunteers. Induction and continuous staff training on safeguarding students relevant to roles and responsibilities are also provided.

1.9 This Policy has been developed following the principles established by:

1. Education Act 2011
2. Children Act 1989
3. Children Act 2004
4. Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012
5. Counter-Terrorism and Security Act 2015
6. Childcare Act 2006; Childcare (Disqualification) Regulation 2009
7. Children and Families Act 2014
8. Children and Social Work Act 2017
9. Data Protection Act 2018; General Data Protection Regulation (GDPR) 2018
10. Equality Act 2010
11. Human Rights Act 1998

and with reference to the following key documents and statutory guidance:

12. Keeping Children Safe in Education 2026
13. Working Together to Safeguard Children 2026
14. Disqualification under the Childcare Act 2006; effective 31st August 2018
15. Prevent Duty Guidance 2023
16. The Prevent Duty; Departmental advice for FE Colleges and childcare providers 2019 (revised Home Office 2021)
17. What to do if you're worried a child is being abused: Advice for Practitioners 2015
18. Information sharing; Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018
19. UKCIS Sexting in Colleges; Responding to incidents and safeguarding young people
20. Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation
21. Teacher Standards 2021
22. Sexual Offences Act 2003
23. Serious Crime Act 2015
24. Promoting and supporting mental health and wellbeing in schools and Colleges DfE, 2021
25. Guidance for Safer working practice 2019 and Addendum 2020
26. On-line Safety within Keeping Children Safe in Education 2023, The Education People
27. On-Line Safety Act 2023
28. Department of Education, Keeping Children Safe, Non Statutory guidance for providers running out of school settings
29. NSPCC- Safeguarding children with special educational needs and disabilities (SEND) 2025
30. NSPCC-Safeguarding child protection/deaf and disabled children and young people 2025

1.10 This policy should be viewed alongside the following College policies which have relevance to safeguarding and promoting the welfare of children:

- Admissions Policy
- Anti-Bullying Policy (Students)
- Standards and Expectations (Students)
- Code of conduct (Staff)
- Contractors Policy
- Criminal Convictions Policy and Procedure
- Drugs, Alcohol and Substance Misuse Policy
- Equality and Diversity Policy
- Fitness to Study Policy and Procedure
- Grievance Procedure
- Health and Safety Policy and Procedures
- ICT Acceptable Usage Policy
- ID Badge Policy
- Lettings Policy
- Lone Working Policy
- Managing Allegations Policy
- Missing From Education Procedure
- Positive Behaviour Policy
- Mental Health Policy
- Online Safety Policy
- Recruitment and Selection Procedure
- Risk Assessment Supervision Pending DBS Disclosure Policy
- Searching, Screening and Confiscation Policy
- Sexual Violence and Sexual Harassment Policy
- Staff Bullying Policy
- Vulnerable Students Covenant
- Whistleblowing Policy and Procedures
- Work Placement Policy
- Students who are temporarily disadvantaged process

- 1.11 Safeguarding is everybody's responsibility and, as such, this policy applies to all staff, governors and volunteers working in the College. An allegation, disclosure or suspicion of abuse, or an expression of concern about abuse, could be made to any member of staff, not just those with a teaching or welfare-related role. Similarly, any member of staff may observe or suspect an incident of abuse. The College continues to look out for low-level concerns and deals with them in accordance with the guidance.
- 1.12 This policy replaces the previous Safeguarding Policy 2025/26 and is reviewed on an annual basis.

2. DEFINITIONS

Abuse - may be physical, sexual, emotional, neglect, domestic violence, financial, institutional or discriminatory. Abuse is behaviour which deliberately or unknowingly causes harm. Abuse can be passive i.e. failure to care for someone, take action or alert about abuse. Abuse can be an isolated event or repeated.

Adverse Childhood Experiences (ACES) - ACES are highly stressful and potentially traumatic events and situations that occur during childhood or adolescence.

Artificial Intelligence (AI) – Enabled Abuse

AI enabled abuse includes the creation use or sharing of content generated or altered using artificial intelligence to harass, coerce, exploit, impersonate, deceive or harm. This includes AI generated sexual imagery 'deep fake' video or audio, and AI produced text used to threaten, humiliate or manipulate. Any such incident will be treated as a safeguarding concern.

Attachment – attachment refers to the pattern of relationships we have had with parents/carers in our early lives, it is the emotional bond which forms between a parent/carer which has a huge impact on development.

Child – following The Children Act 1989, (and also in the Children Act 2004) and therefore in accordance with the law, the College shall regard any student below the age of 18 as a child.

Child Sexual Exploitation (CSE) - Sexual exploitation of children and young people under 18 involves exploitative situations, contexts or relationships where young people (or a third person/s) receive 'something': (e.g. accommodation, drugs, alcohol, cigarettes, food, affection, gifts, money) as a result of them performing, and/or another/others performing sexual activities on them. Child sexual exploitation can occur through the use of technology without the child's immediate recognition, e.g. being persuaded to post sexual images on the Internet or sending photos by text without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, and involvement in exploitative relationships often being characterised by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Child Criminal Exploitation (CCE) - Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including sex, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the 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. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More details including definitions and indicators are included in Annex B. While there is still no legal definition CCE, it is increasingly being recognised as a major factor behind crime in communities across Merseyside and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm (Merseyside Police Commissioner)

Cyberflashing - typically involves sending an unsolicited sexual or nude image to victims via social media or dating apps, but can also take place through data sharing services with strangers such as Bluetooth and Airdrop – something which commonly happens on the

transport network. The Online Safety Act has criminalised this behaviour and the Crown Prosecution Service will now be able to hold offenders to account through the court of law.

Children in the Court System- Children involved in the court system may be vulnerable due to the emotional impact of legal proceedings, disruption to family life, and exposure to distressing content. This includes children who are:

- Witnesses in criminal cases
- Involved in family court proceedings (e.g. custody, care orders)
- Subject to youth justice interventions

These children may experience anxiety, trauma, or confusion about the process. Staff should be alert to changes in behaviour, attendance, or wellbeing and offer appropriate support. Safeguarding concerns must be logged and escalated in line with college procedures. The College will work with families and external agencies to ensure the child's voice is heard and their welfare prioritised.

Discriminatory Abuse - includes racism, sexism or discrimination based on a person's disability.

Domestic Abuse - 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. Children 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.

Emotional Abuse - emotional abuse is the persistent emotional ill-treatment as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations are being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing the ill-treatment of another person. It may include serious bullying, including cyberbullying. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

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

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

Financial or Material Abuse - includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

Financial Exploitation – Financial exploitation includes coercion, manipulation or deception resulting in financial loss, debt, fraud, theft, misuse of benefits, unlawful financial activity, or pressure on a child to engage in financial crime, including online scams.

Forced Marriage - where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. Forced Marriage is different from, and should not be confused with, arranged marriage. A student who feels they are likely to be forced to marry someone they do not wish to marry is often experiencing some form of abuse such as physical, psychological, financial, sexual or emotional pressure e.g., being made to feel like they are bringing shame on their family. Confidentiality is *extremely* important in these circumstances. If there are concerns that a student is in danger of a forced marriage the Learner Wellbeing Team will follow government guidelines and will contact the Forced Marriage Unit. Forced marriage is illegal in the UK. The student's family should not under any circumstances be contacted without consultation with the Learner Wellbeing Officer and student.

Female Genital Mutilation (FGM) - refers to procedures that intentionally alter or cause injury to the female genital organs including breast for non-medical reasons. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. All staff have a duty to act to safeguard girls at risk of FGM. The risk to girls and young women increases where a relative has undergone FGM and victims are most likely to come from a community that is known to practice FGM. Girls at risk of FGM may not yet be aware of the practice or that it may happen to them, so sensitivity should always be shown when approaching the subject. FGM is illegal in the UK. It is also illegal to arrange for a child to be taken abroad for FGM. Staff need to remain vigilant when potentially vulnerable females report that they are going abroad or returning from trips abroad and should look out for signs such as uncomfortableness when sitting or needing to use the toilet more frequently. If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the **tutor** must report this to the police. The Learner Wellbeing Team will support them in making the referral.

Note: Care should be taken not to approach the family or attempt to mediate if forced marriage, honour-based violence or FGM is suspected.

Breast ironing or flattening – this is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or to delay the development of the breast entirely. These practices cause significant health and developmental issues which are both physical and psychological. Although there is no specific legislation in the UK around breast flattening or ironing, this is a form of physical abuse, and this should always be reported to the Learner Wellbeing Team.

Child on Child abuse - This is most likely to include, but may not be limited to, bullying (including cyberbullying, prejudice based and discriminatory), abuse in intimate personal relationships between children 'Teenage relationship abuse', sexual violence, sexual harassment, causing someone to engage in sexual activity without consent, consensual and non-consensual sexting (youth-produced sexual imagery), physical abuse, initiation/hazing type violence and rituals, and 'up skirting' (which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause the victim humiliation, stress or alarm). Children who display harmful behaviour towards other children may themselves be experiencing trauma, coercion, unmet needs, exploitation or abuse. Safeguarding responses will therefore consider the welfare and needs of both children alongside risk management process.

Gaming -can present safeguarding risks for children and young people, particularly when online platforms include chat functions, in-game purchases, or exposure to inappropriate content. Risks include:

- **Online Grooming:** Children may be contacted by adults posing as peers through multiplayer games.
- **Exposure to Harmful Content:** Violent, sexualised, or extremist material may be embedded in games or shared by other users.
- **Addiction and Isolation:** Excessive gaming can impact mental health, sleep, and social development.
- **Financial Exploitation:** In-game purchases and gambling-style mechanics may lead to financial harm or coercion.
- **Bullying and Peer Pressure:** Children may experience cyberbullying or pressure to behave in risky ways during gameplay.

Harm outside the home – previously contextual safeguarding highlights the importance of understanding the child’s wider social setting and how it can be an important factor in managing risk.

Homelessness – being homeless or being at risk of homeless presents a real risk to a student’s welfare. Indicators that a family may be at risk of homelessness included household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. All cases should be referred to the Welfare Officers for signposting support to external agencies.

Honour Based Violence – *“a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community”* (Crown Prosecution Service). It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditions and beliefs of their culture. For example, honour-based violence might be committed against people who:

- want to get out of an arranged or forced marriage
- become involved with a boyfriend or girlfriend from a different culture or religion
- wear clothes or take part in activities that might not be considered traditional within a particular culture

The term ‘honour-based crime’ covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence. It can include:

- personal attacks of any kind, including physical and sexual violence
- forced marriage
- forced repatriation (sending someone back to their country of origin without their consent)
- written or verbal threats or insults
- threatening or abusive phone calls, emails and messages

Human Trafficking & Modern-Day Slavery - *“the movement or recruitment by deception or coercion for exploitation through sexual exploitation, forced labour, domestic servitude, forced street crime, cannabis cultivation, grooming and other forms of abuse”* (Stop The

Traffik – 2016). Since November 2015, public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking.

LGBTQ+ and Gender-Questioning Children - The College recognises that LGBTQ+ students, including those who are gender-questioning, may face increased safeguarding risks due to discrimination, isolation, mental health challenges, and vulnerability to exploitation. A sensitive trauma informed approach will be adapted at all times. The college will not initiate, encourage or direct social, medical or legal gender transition. Support will focus on safeguarding, wellbeing and mental health. Parents/carers will be involved unless doing so would place the learner at risk of harm. College records will accurately record biological sex in line with statutory requirements, while maintaining dignity and privacy.

Staff must adopt a sensitive, trauma-informed approach when supporting gender-questioning students. This includes:

- Ensuring the student's voice is central to any support offered
- Avoiding assumptions or pressure regarding gender identity or transition.
- Recognising that gender-questioning students may be at increased risk of self-harm, bullying, or coercion.

Any safeguarding concerns must be logged and escalated in line with college procedures. The College will work with families and external agencies to ensure a coordinated and supportive response, while maintaining the student's safety and dignity

Mental Health and Self Harm- The College recognises that mental health concerns and self-harm may be indicators of underlying trauma, abuse, exploitation and neglect. These issues can significantly affect a student's wellbeing, attendance, and ability to engage in education. Mental Health concerns must be addressed in isolation and should be considered in the wider safeguarding content.

- Staff must be alert to signs of emotional distress, suicidal ideation, or behaviours that may indicate a student is at risk of harm to themselves or others.
- All concerns must escalate to the Learner Wellbeing Team immediately.
- Where appropriate, referrals should be made to the most appropriate services including **Children's Help and Advice Team (CHAT)**, which acts as the front door to Sefton's Children's Social Care, Early Help, or signposting to community or mental health services.
- Staff should respond with sensitivity and avoid judgement or punitive measures, recognising that self-harm may be a coping mechanism.
- The College will work with families and external agencies to ensure coordinated support and intervention, with the student's voice central to any decisions made.

Misogyny – Misogyny refers attitudes, language, behaviours, that promote hostility, prejudice or discrimination towards women and girls. This includes online and offline behaviour, involvement in misogynistic online communities, and sexualised harassment. Misogynistic behaviour is recognised as a safeguarding concern.

Neglect - is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or

treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting them from emotional harm or danger. Neglect may include acts of omission such as ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating. Victims of neglect often suffer other types of abuse. Neglect may occur if a parent becomes physically or mentally unable to care for a child or where they have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Organised Crime Group - a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise). This involves serious and organised criminality by a hard core of violent gang members who exploit vulnerable young people and adults. This may also involve the movement and selling of drugs and money across the country, known as 'county lines' because it extends across county boundaries. Young men and women may be at risk of sexual exploitation in these groups.

There is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control, however, there are significant links between different levels of gangs. Activity can include street gangs' involvement in drug dealing on behalf of organised criminal groups and the sexual abuse of girls and boys by organised criminal groups.

Physical Abuse - actual or likely physical injury, or failure to prevent injury. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

Private Fostering - Private fostering must be considered when a child under the age of 16 (or 18 if the young person has a disability) has been living with individuals who are not their parents or close relatives for 28 days or more.

Psychological Abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, or isolation.

Radicalisation – susceptible individuals being targeted for recruitment into extremism. Protecting individuals from the risk of radicalisation is similar in nature to protecting them from other forms of harm and abuse. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific factors may contribute to vulnerability which are often combined with influences such as family, friends, or the internet, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media is a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Risk to Self and/or Others – this may include but is not exclusive to self-harm, suicidal ideations, suicide attempts or potential risk of harming others, which may or may not

include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress and mental health issues.

Safeguarding – includes promotion of Mental, Physical health and well-being as well as protection of specific individuals

Self-neglect - is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Serious Violence – includes crimes such as homicide, knife crime, gun crime and violence against the person. It includes areas of criminality where serious violence or its threat is inherent such as county lines drug dealing or organised crime.

Sexual Abuse - Involving forcing or enticement to take part in sexual activities, including prostitution, whether the individual is aware of what is happening. Activities may involve physical contact including penetration or non-penetrative acts. For example, it could include a child/vulnerable adult looking at or being involved in the production of/watching sexual online images or watching sexual activities, or encouragement to behave in sexually inappropriate ways and can include grooming in preparation for abuse. Many young people who are victims of sexual abuse do not recognise themselves as such. They may not understand what is happening or even understand that it is wrong. It is recognised that sexual abuse can take place within a relationship whether heterosexual or same-sex or outside of a relationship. It can include rape and sexual assault or sexual acts to which a vulnerable adult/child has not consented, could not consent to or was pressured into consenting to. This may also include the use of new technologies, for example, YPSI (see below). Sexual abuse is not solely perpetrated by adult males; women and children can commit acts of sexual abuse too.

Sexual Violence and Harassment - Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. **Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.** When referring to sexual violence this is in respect of sexual offences under the Sexual Offences Act 2003 as described below:

- *Rape*
- *Assault by penetration*
- *Sexual Assault*

When referring to sexual harassment this means '**unwanted conduct of a sexual nature**' that can occur online and offline. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Colleges should be considering when any of this

crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos.
 - sexualised online bullying.
 - unwanted sexual comments/messages, including on social media; - sexual exploitation; coercion and threats.

Significant Harm - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)

Vulnerable Adult – is or may need Community Care Services by reason of mental or other disability, age or illness and is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

Vulnerable Students - In addition, The College recognises the following groups of students as 'Vulnerable' due to their circumstances and therefore provides support:

- Cared for
- Care Experienced
- Those who have been previously Looked After
- Teenage parents
- Those with caring responsibilities
- Students under the Youth Justice
- Those who are supported by Children's Services and have or have had a Social Worker.

Youth Produced Sexual Imagery (YPSI) – formerly known as 'sexting' YPSI generally refers to the sending of sexually explicit images via text, email, or through social networking sites. For example, this could be a photograph of a young woman in a state of undress or a boy exposing himself. 'YPSI' is commonplace amongst young people. Many young people do not see 'YPSI' as a problem and are often reluctant to talk to adults about it because they are afraid of being judged or having their phones taken away. It may be common, but 'YPSI' is illegal. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary.

3. ACCOUNTABILITY

3.1 All staff, volunteers and governors working in the College are responsible for the operation of this policy.

3.2 The Designated Safeguarding Lead for the College is Stephen Musa, Deputy Principal.

In his absence, the Organisational Lead is Liz Jones, Director Learner Wellbeing or Karen Marsh, Learner Wellbeing Manager.

Learner Wellbeing Officers are:

- Jodie Marcucci
- Anne Marie O'Donovan
- Heather Jamieson

3.3 All members of staff have a legal duty to report any disclosure, allegation, or suspicion of abuse to a member of the Learner Wellbeing Team or in their absence the DSL or DDSL. This must be done immediately following the disclosure or suspicion is made or arises. This must also be logged on Pro Monitor and if urgent contact made directly with a Learner Wellbeing Officer in person or via the telephone.

3.4 The Learner Wellbeing Officers have a duty to make a referral to Children's Social Care, whenever there is reason to suspect that a child is suffering, or likely to suffer, significant harm. Where a professional disagreement occurs between workers when working with children and families, the Escalation Policy can be referred to.

3.5 Parents will be informed of any referrals made to Children's Social Care and consent will be gained. Parents will not be contacted when this would put the child at increased risk of significant harm (e.g. in case of suspected Fabricated or Induced Illness, Sexual Abuse where a family member is the suspected perpetrator, FGM or Forced Marriage). Any decision not to inform parents/carers should be recorded on the Children's Social Care referral form with the reasons for such a decision and a copy will be kept on the student's file.

3.6 The welfare of the child/children concerned, including the welfare of any other children who may be at risk, must always take precedence over confidentiality.

3.7 The Learner Wellbeing Officer will make every effort to attend any meetings resulting from the safeguarding process to which the College is invited.

3.8 The Learner Wellbeing Officer attending the meeting is responsible for ensuring that any actions agreed at such meetings are progressed and followed up.

3.9 The Designated Safeguarding Lead and deputies must complete the Sefton Safeguarding Children Partnership for DSL's training. This level of training must be updated at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis. This is to ensure designated staff have appropriate, up to date knowledge

and skills which will enable them to identify concerns and make decisions that support the safety of the College community.

- 3.10 All staff working in the College must be given access to a copy of the Safeguarding Policy immediately upon starting work at the College as part of their induction.
- 3.11 All staff working in the College must attend annual face to face contextual safeguarding training in addition to an annual online course that tests their knowledge and understanding.
- 3.12 The Governing Body will also undergo Safeguarding training as above which will be specific to their role and responsibilities.
- 3.13 A summary of safeguarding cases and pertinent safeguarding issues that have been dealt with by the College will be reported to the Board of Governors on a termly basis. All reporting to the Board of Governors will be anonymised and will contain enough detail to allow appropriate scrutiny and oversight.
- 3.14 The Board of Governors shall be responsible for ensuring that the College has up to date policies in place with respect to Safeguarding, which include procedures for handling allegations against adults working with children whether in a paid or voluntary capacity.
- 3.15 The Board of Governors will ensure that the College operates safer recruitment procedures including:
- at least one member of every recruitment panel having completed approved Safer Recruitment training
 - appropriate DBS checks completed for staff (including Barred List checks and relevant overseas checks where appropriate)
 - Social Media checks at the point of shortlisting
 - the maintenance of an accurate Single Central Record
- 3.16 Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- Are supported by Youth Justice
- Are teenage parents
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are cared for or care experienced or previously cared for

4. ROLES & RESPONSIBILITIES OF STAFF

- 4.1 All staff will read and understand Part one of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education in full, and review this guidance at least annually. This requirement applies to all staff, governors, volunteers and contractors regardless of role.
- 4.2 Through regular contact with students, all staff across the College community are well placed to identify concerns and have individual responsibility for reporting such concerns to the Learner Wellbeing Officers, Designated Safeguarding Lead or Deputy.
- 4.3 Staff will ensure that they are able to recognise possible indicators of abuse and neglect (see Definitions) and know who to report their concerns to.
- 4.4 Staff will report any safeguarding concerns to a Learner Wellbeing Officer without delay and in a timely fashion. Verbal reporting of concerns will then be followed up in writing on Pro Monitor as soon as possible but always within 24 hours. Rather than thinking "what if I'm wrong?" staff are encouraged to think "what if I'm right?" and always that "It could happen here" in relation to any safeguarding concerns.
- 4.6 Staff will ensure that concerns relating to a student remain confidential and are only shared with the Learner Wellbeing Officer.
- 4.7 Staff will co-operate with safeguarding enquiries made by Children's and Adult Social Care in relation to students.
- 4.9 Staff will ensure that they attend contextual Safeguarding training annually and also complete Smart log online training that incorporates the Prevent Duty and Part one in addition to the College's Safeguarding Policy and Procedures.
- 4.10 Staff will ensure that they are familiar with and understand all College safeguarding related policies and procedures for example Mental Health and Sexual Violence and Sexual Harassment.
- 4.11 All staff should be aware that children 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. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL/Learner Wellbeing Officers if they have concerns about a child.

5. ROLES & RESPONSIBILITIES OF DESIGNATED SAFEGUARDING LEAD

- 5.1 The DSL is a member of the Senior Leadership Team. Our DSL is Stephen Musa, Deputy Principal. The Organisational Lead is Liz Jones, Director Learner Wellbeing whom is supported by Karen Marsh who is also a DDSL and Senior Mental Health Lead. Karen Marsh manages a team of Learner Wellbeing Officers that on a day-to-day basis deal with all Safeguarding referrals.
- 5.2 The Governing Body will ensure that an appropriate senior member of staff is appointed to the role of Designated Safeguarding Lead. The Designated Safeguarding Lead (DSL) will be a member of the Senior Leadership team and the role will be explicit within their job description. This person will have the appropriate status and authority within the College to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter- agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. He/ she will undertake the following as part of the role:
- act as a source of support, advice and expertise for all staff
 - act as a point of contact with the safeguarding partners
 - liaise with the Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
 - as required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
 - liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically
 - liaise with the Senior Mental Health Lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health and they are working with the team
 - promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
 - work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or College
 - This includes ensuring that the College knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes
 - Provide the Governing Body with an up-to-date analysis of safeguarding related issues and numbers of vulnerable students to enable them to scrutinise, challenge and support the College as necessary
 - Ensure the College’s child protection and safeguarding related policies are up to date and reviewed annually. Work with the Governing Body / Designated Governor regarding this

- Complete the internal Audit as required. Work with the Principal and Designated Governor regarding this
- Ensure every member of staff has access to and understands the College's Safeguarding related policies (including whistleblowing, etc.)
- Ensure that parents have access to the Safeguarding Policy which alerts them to the fact that referrals may be made and the role of the College to avoid possible future conflict
- Ensure students are aware of the Safeguarding Policy
- Ensure that the most up to date version of the Safeguarding Policy is available to download from the College website and that appropriate safeguarding information is displayed to website visitors
- Ensure all staff have induction training which covers Safeguarding and can recognise and report any concerns immediately when they arise, including the fact that there is also the possibility of child-on-child abuse
- Ensure all staff are aware of and adhere to the College's Code of Conduct. Ensure that this Staff Code of Conduct includes references to online conduct and e-safety and is reviewed on an annual basis
- Provide strategic leadership in multi agency safeguarding arrangements, ensuring emerging risks such as online harm, AI enabled abuse, misogyny, exploitation and mental health risks are identified early and are responded to collaboratively.

6. ROLES & RESPONSIBILITIES OF GOVERNING BODY AND DESIGNATED GOVERNOR

The Governing body and Designated Governor are responsible as follows:

- The College facilitates a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- The College has appointed an appropriate senior member of staff from the College leadership team to the role of Designated Safeguarding Lead (DSL) with named deputies
- Evaluation and approval of this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
- Appointment of a governor to lead on safeguarding to monitor the effectiveness of this policy in conjunction with the full governing board
- That the lead governor accesses the designated safeguarding governor training and any associated briefings
- All staff members receive regular safeguarding and child protection updates including separate online training, at least annually, to provide them with the relevant skills and knowledge to keep our children safe. For example, 7 minute briefings which can be found at: <https://seftonscp.org.uk/p/7-minute-briefings>
- At Induction all Governors should receive the above training
- The College has recruitment and selection procedures in place
- Any **child protection files** are maintained as set out in Annex B; KCSIE (2026)
- The College undertakes an annual safeguarding audit of the College's procedures, processes and practice and ensure any actions that have been identified in areas that need improving are put into place
- If an allegation of abuse is made against the Principal, the chair of governors acts as the 'case manager'

- The College has appropriate IT filtering and monitoring systems in place and should be informed in part, by the risk assessment required by the Prevent Duty to limit children's exposure to online risks
- The College have procedures in place for supporting students with medical/health conditions
- The governing body, along with the College's senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off site providers and provisions that their safeguarding arrangements are secure, in keeping with the requirements set out in KCSIE 2026. This includes ensuring that the provision has effective safeguarding policy/procedures/training in place for all staff. The provision follows safer recruitment processes and have clear allegation management processes. Where there is an allegation against staff relating to organisations/individuals using our premises, the concern must be reported to the College who will follow our procedures including contacting the LADO if necessary.
- The governing body will supply information as requested by the Sefton Strategic Safeguarding Partnership
- The Governors should be aware of their obligation under The Human Rights Act 1998, The Equality Act 2010, (including the Public Sector Equality Duty 2023), and the local multi agency arrangements

(The full responsibilities of the governing body are set out in Part Two of KCSIE 2026– The management of safeguarding. The governing body will ensure that the school is fully compliant with their statutory safeguarding responsibilities.)

7. EARLY HELP (0-19 YEARS OLD)

- 7.1 Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the Learner Wellbeing Officers.
- 7.2 The College is committed to using the Early Help process to support children and their families and will take on the role of Lead Practitioner where this is deemed to be appropriate. The College has staff that are trained in delivering early help support and using the early help system. If a referral is required, this will be done by contacting FAST and making a telephone referral (telephone number at front of Policy).
- 7.3 The Locality Teams in Sefton are located across Family Well-being Hubs.
- 7.4 Any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who:
 - Is disabled and has specific additional needs
 - Has special educational needs (whether they have a statutory education, health and care plan
 - Has a mental health need
 - Is a young carer
 - Is showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised crime groups or county lines
 - Is frequently missing/goes missing from education/home or care

- Has experienced multiple suspensions, reduced timetables or is at risk of being permanently excluded from college
- Persistent removal or avoidance of classes
- Chronic disengagement, wandering or refusal to attend classes
- Escalating behavioural concerns impacting learning or wellbeing
- Is misusing alcohol or other drugs themselves
- Is at risk of modern slavery, trafficking, sexual and or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has a parent or carer in custody or is affected by parental offending
- Is at risk of honour-based abuse such as FGM or Forced Marriage
- Is at risk of being radicalised or exploited
- Is a privately fostered child
- Has experienced ACES and Trauma

7.5 Knowing what to look out for is vital to the early identification of abuse, neglect and exploitation. If staff are unsure, they should always speak to the Learner Wellbeing Officers. If in exceptional circumstances the Officers are not available, the DSL or DDSL should be consulted. This should not delay appropriate action being taken.

8. RESPONDING TO A DISCLOSURE OR SUSPICION OF ABUSE

- 8.1 Any member of staff (or a governor) who has knowledge of or a suspicion that, a child / vulnerable adult is or has been suffering significant harm must refer their concern to a Learner Wellbeing Officer as soon as possible. They must immediately record all information disclosed onto ProMonitor/ under confidential comments for the Learner Wellbeing Team, pass any written notes to the Learner Wellbeing Officers and must not retain any written information. All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in college in the first instance.
- 8.2 The member of staff who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information, which will later be record in full onto ProMonitor:
- date and time of report
 - your name and name of complainant
 - name and DOB of child/vulnerable adult alleged to have been abused
 - nature of alleged abuse
 - description of any injuries observed, (body map of injuries to be used if required) if any
 - any other information given, including siblings if relevant (their full names and DOB if possible)
 - confirmation that the student has been advised of the next steps and note any consent given
- 8.3 Questions should be kept to the minimum required for clarity, and leading questions must be avoided.

8.4 If abuse is suspected but not disclosed, it may be appropriate to remind the student about the availability of the College Counselling Service or external help lines.

8.5 The Learner Wellbeing Officer will make the referral and the DSL/DDS is informed. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required.
- whether the child is in need, and should be assessed under section 17; or a Children's and Families Assessment is required
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47.

8.6 If a tutor, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, the tutor must report this to the Police. Safeguarding staff can provide support to the tutor in such instances.

8.7 Staff (usually the Learner Wellbeing Officers) should follow up on a referral should that information not be forthcoming. Should they be dissatisfied with the actions being taken by a local authority then the relevant authority's escalation procedures should be followed. [Sefton Local Safeguarding Children Partnership - Sefton SCP Escalation Procedure](#)

9. CONFIDENTIALITY

As a fundamental principle, staff will offer a confidential service to students using the College, with information only being disclosed with the student's consent or where there are legal requirements to do so. The boundary of confidentiality for each staff member is that information is only passed to somebody who is authorised to receive it from someone who is authorised to disclose it. Regarding disclosure or sharing information, the main principle to be observed is that any disclosure should be kept to a minimum and on a need-to-know basis (the minimum necessary is the maximum permissible).

1. Young people, including those aged under 16, generally have the same right to confidentiality as do adults. However, staff cannot offer or guarantee absolute confidentiality to any students in the following circumstances:

- a. where safeguarding issues are involved.
- b. where there is significant threat to life (the student's own life or someone else's);
- c. where a person needs urgent medical treatment; and or
- d. where potential or actual serious criminal offences are involved

2. Limits to confidentiality will be made clear to students at the earliest opportunity. Where confidentiality must be broken, the staff member should seek to ensure that the student is informed first or as soon as possible afterwards.

3. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe and promoting their welfare. Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a

condition that allows practitioners to share information without consent. Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.

4. Staff should not assume a colleague or another professional will act and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or deputy. Fears about sharing information should not stand in the way of the need to promote the welfare, and protect the safety, of children.

5. Information should be necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.

6. The College counsellors work to the British Association for Counselling and Psychotherapy ethical framework. This allows the counsellor to break confidentiality in circumstances, with or without the student's consent, if necessary, were, in her/his professional judgement:

- there is a serious risk of the student harming themselves or being harmed
- there is a serious risk of another person being harmed
- there is a risk of a serious crime being committed.

10. RECORDING, MAINTENANCE & TRANSFER OF RECORDS

- 10.1 All safeguarding concerns should be recorded on Pro Monitor. Staff making records will ensure that they clearly distinguish between fact and opinion and whether the information is 1st or 2nd hand. Records will clearly evidence the voice of the child and will always be written contemporaneously.
- 10.2 All Safeguarding files are electronically held, either on Pro Monitor or in secure central electronic area that only the DSL, Learner Wellbeing Officers and Director Learning Support and Inclusion.
- 10.3 If a child transfers between Colleges the Designated Safeguarding Lead/Learner Wellbeing Officers will transfer the child's Safeguarding File to the new College where known. The Designated Safeguarding Lead/Learner Wellbeing Officer will speak to their counterpart in the College to which the child is transferring to ensure that they are aware that the file is to be transferred. Upon confirmation of the child starting on roll the file should be transferred within 5 days where possible. The file should be signed upon receipt and delivered by hand wherever possible.

11. ALLEGATIONS MANAGEMENT

- 11.1 Any person who witnesses or becomes aware of an allegation against a staff member or contractor at Southport College should not share this with any other colleagues other than reporting it immediately to the Designated Safeguarding Lead (DSL), the Deputy Designated Safeguarding Lead (DDSL) or the Vice Principal People and Culture, who will act with the authority of the Principal.
- 11.2 The person reporting the allegation should provide as much detail as possible, including dates, times, locations, and the names of any individuals involved. They should not question or investigate the matter any further.

11.3 These procedures (see Managing Allegations Policy for further guidance) must be followed in any case in which it is alleged that a member of staff (including supply staff, contractors and individual / organisations using our premises), governor, visiting professional or volunteer has met the harm test, this includes where an adult has:

- a) Behaved in a way that has harmed a child or may have harmed a child
- b) Possibly committed a criminal offence against or related to a child
- c) Behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children; or
- d) Behaved or may have behaved in a way that indicates they may not be suitable to work with children. **(This includes any behaviour that may have happened outside of College that might make the individual unsuitable to work with children. This is known as transferable risk.)**

12. WHISTLEBLOWING

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

Staff working in the College may be the first to recognise that something is wrong but may not feel able to express their concerns out of a feeling that this would be disloyal to colleagues or for fear of harassment or victimisation. These feelings, however natural, must never result in a student continuing to be unnecessarily at risk. Staff must remember that it is often the most vulnerable child who is targeted. These young people need adults they can trust to safeguard their welfare.

Reasons for whistleblowing:

- Everyone has a responsibility for raising concerns about unacceptable practice or behaviour
- To prevent the problem worsening or widening
- To protect or reduce risks to others
- To prevent becoming implicated yourself

What stops people from whistleblowing?

- Fear of starting a chain of events which spirals out of control
- Disrupting the work or project
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed

See Whistleblowing Policy for further guidance.

Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available. Staff can call 08000 028 025 – 8am – to 8pm, Monday to Friday and email: help@nspcc.org.uk Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH.

13. PROACTIVE SAFEGUARDING

- 13.1 The College recognises that it plays a significant part in the prevention of harm to our learners by providing them with opportunities to learn, clear lines of communication with trusted adults, supportive peers and an ethos of protection.
- 13.2 The College recognises that it may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 13.3 The College recognises that safeguarding incidents and/or behaviours can be associated with factors outside of College or can occur between children outside the College. All staff, but especially the Learner Wellbeing Officers, Deputy and Designated Safeguarding Lead should consider the context within which such incidents or behaviours occur. This is known as harm outside the home which 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.
- 13.4 The College community will:
- Work to establish and maintain an ethos where students feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
 - Promote a caring, safe and positive environment within the College
 - Ensure that the College site is a safe, secure and welcoming place to learn and grow
 - Encourage self-esteem and self-assertiveness through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying
 - Include regular consultation with students e.g. through student focus groups, participation in EDI events, etc
 - Ensure that all students know there is an adult in the College whom they can approach if they are worried or in difficulty
 - Include safeguarding messages across the curriculum, to ensure that the students are equipped with the skills they need to recognise risky behaviours, stay safe from harm and to know to whom they should turn for help. In particular this will include Progress sessions on staying safe online, anti-bullying, issues around consent, sexting, positive mental health, staying safe, positive relationships including sexual health and dealing with safeguarding concerns when on work experience/industrial placement etc
 - Offer a positive College experience
 - Ensure all staff are aware of College guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

14. SAFEGUARDING YOUNG PEOPLE WHO ARE SUSCEPTABLE TO EXTREMISM

- 14.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise susceptible children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them susceptible to future radicalisation.

- 14.2 The College values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both students and tutors have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 14.3 Under duties imposed within the Prevent Duty Guidance 2023 as part of the Counter Terrorism and Security Act 2015, The College will ensure that situations are suitably risk assessed, that they will work in partnership with other agencies, that all staff are suitably trained and that IT policies will ensure that children and young people are safe from terrorist and extremist material when accessing the internet in College.
- 14.4 The College's Lead (Single Point for Contact) for Prevent is: Stephen Musa. The Lead link with other relevant agencies (including the Police) to ensure that susceptible people are appropriately supported, and risk assessed, and that all staff and Governors have received training to ensure they are able to recognise any concerns.
- 14.5 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation. The College is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 14.6 The College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- 14.7 The Channel and Prevent contacts within Merseyside Constabulary are:

Declan Sammin, Merseyside Prevent Engagement Officer - 07394559107
Declan.sammin@liverpool.gov.uk

Martin Leyland, Merseyside Police Prevent Sergeant
Bus - 0151 777 4878
Mobile - 07976 514 501
Email: martin.leyland@merseyside.pnn.police.uk
Alternatively, there are the following national contacts available:

Anti-Terrorist Hotline - 0800 789 321
Text Phone Service - 0800 032 4539
Website: <https://secure.met.police.uk/athotline/>

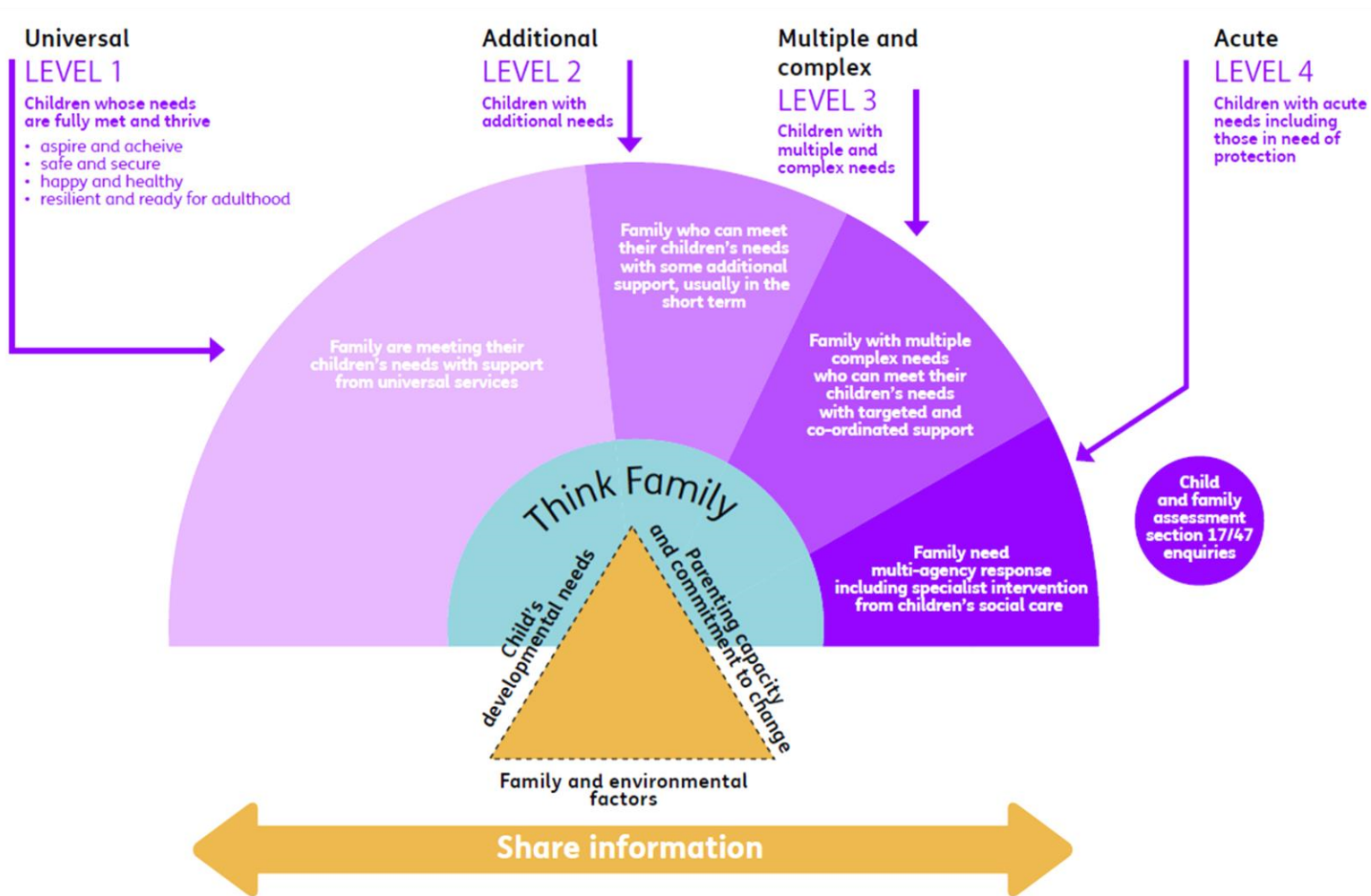
15. Use of Artificial Intelligence (AI) and Emerging Digital Risks

- 15.1 The College recognises that artificial intelligence (AI) technologies present both opportunities and risks within educational and safeguarding contexts. While AI can enhance learning and efficiency, it also introduces potential safeguarding concerns related to data security, misinformation, bias and student wellbeing.

- 15.2 Staff and students must only use AI tools in accordance with the College's Acceptable Use Policy. Any use of AI that results in the generation, sharing or reinforcement of harmful, discriminatory or inappropriate content (including but not limited to sexualised material or extremist views) will be treated as a safeguarding matter and referred to the Learner Wellbeing Team.
- 15.3 Staff should be particularly alert to the use of AI-generated materials by students that may mask distress or trauma, promote ideologies of harm (e.g. self-harm, radicalisation), or include signs of coercion or abuse. Any such concerns must be logged and escalated in line with the College's safeguarding procedures.
- 15.4 The College prohibits the use of AI tools to impersonate staff, students, or others or to generate misleading information that could result in reputational or psychological harm.
- 15.5 – All staff and students will be educated on the responsible use of AI tools, including understanding misinformation, digital footprints, and the risks of impersonation or manipulation. Staff must remain alert to the use of AI tools that may mask distress, promote harmful ideologies, facilitate exploitation or generate inappropriate content.
- 15.6 AI-generated sexual imagery, deep fake abuse, impersonation, or coercion involving learners will be treated as child on child abuse and or sexual abuse.

Appendix 1

Sefton Levels of Need*



- More detail can be found in:
https://seftonscp.org.uk/assets/1/sefton_safeguarding_children_partnership_lon_guidance_for_web.pdf