INTERNAL PROCEDURE

TITLE: Safeguarding policy

POLICY HOLDER: Vice Principal Safeguarding, Inclusion Student Services

APPROVAL BOARD: College Leadership Team

VERSION NO: 1

LAST REVIEWED: August 2026

REVIEW PERIOD[1]: 1 Year

1 The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version.

Summary: Sets out the College's procedure for safeguarding and promoting the welfare of children, young people and vulnerable adults, providing guidance for staff, volunteers and governors on identifying and responding to safeguarding concerns, child protection, reporting procedures, multi-agency working, safer recruitment, and supporting students to ensure their safety, wellbeing and educational success.

Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information: If you have any queries about this policy or procedure, please contact the named policy holder.

This document is meant for electronic viewing and is maintained as part of the college document control procedure. It is uncontrolled if viewed in hardcopy, printed format

Amendments Log

Date	Reason for Change	Policy ref	By:
12/03/25	Updated Chris Caddamy and Katie Williams to the list of Safeguarding Contacts.	Page 8 and slide on P38	Helen Richardson Hulme
12/03/25	Updated section regarding LADO and EQAIRS advice being sought within timeframes.	12.6 and 12.11	HRH
06/08/2025	Updated in line with revised changes to KCSIE 2025 September.	6.29, 6.21, Added Jen Eves DSL	Sam Warner /Marie Pacey /Katie Williams /Charlotte Hardiment
01/09/2025	Updated Chris Caddamy and Jen Eves to the DSL list. Updated mobile number for Katie Williams and removed Andrew Barnes from the list of Safeguarding Contacts	Page 39 Pages 8 and 39 Page 9	Sonia Hunt
30/10/25	Removed Jo Kershaw from the DSL Listing	Page 8 & 39	Sonia H
04/08/26	Updated in line with revised changes to KCSIE 2026 September. Updated in line with Norfolk Schools Safeguarding Policy model template.	Pages 3 –6, 9-18, 20 – 33, 35 –37, 40-42. Referenced Working together 2026 Inclusion of trainee teachers in 4.2 to reflect greater emphasis in KCSiE 6.4 Expanded on CCE and CSE content to reflect organised network or gangs and victims identifying as part of these groups 6.2 Updated terminology to include universal services and early help teams as per KCSiE. p.582-592 6.38 p.281, additional line added to cover trans students, fully transitioned students and gender questioning students. We have added the title of transgender as we feel there is a need for inclusion as many students identify as trans.	Katie W/ Marie P Helen RH review Sept 26.

WHOLE COLLEGE POLICY FOR SAFEGUARDING INCORPORATING CHILD PROTECTION

City College Norwich

Policy Consultation & Review

This policy is available on our college website and is available on request via email information@ccn.ac.uk We also inform parents and carers about this policy when their children join our college through our college newsletter.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns daily and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff during induction alongside our Staff Code of Conduct, and the safeguarding response to concerns about students. In addition, all staff are provided with Part One of the statutory guidance *'Keeping Children Safe in Education', DfE (*2026).

This policy will be reviewed in full by the Governing Board on an annual basis. This policy was last reviewed and agreed by the Governing Board in October 2026. It is due for review in October 2027.

Contents

1. PURPOSE & AIMS 6
2. OUR ETHOS 6
3. ROLES AND RESPONSIBILITIES 8
The Governing Board 9
The Principal 10
The Designated Safeguarding Lead (DSL) 10
Safeguarding Officers 11
4. TRAINING & INDUCTION 12
5. PROCEDURES FOR MANAGING CONCERNS 14
6. SPECIFIC SAFEGUARDING ISSUES 15
Contextual safeguarding 15
Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence 16
So-called 'honour-based violence (including Female Genital Mutilation and Forced Marriage) 17
Preventing radicalisation and extremism 18
Child on child abuse including harassment and violence 18
Modern Slavery 21
Safeguarding responses to children who are absent from education 21
Mental Health 21
Online Safety 22
Cybercrime 24
Domestic Abuse 24
Children with special educational needs and disabilities or physical health issues 24
Children who are lesbian, gay, bisexual, transgender or questioning their gender 25
7. RECORDS AND INFORMATION SHARING 25
8. WORKING WITH PARENTS & CARERS 26
9. CHILD PROTECTION CONFERENCES 27
10. SAFER RECRUITMENT 28
11. SAFER WORKING PRACTICE 29
12. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS 30
Allegations that may meet the harms threshold 30
Concerns that do not meet the harm threshold 32
13. Use of premises for non-college activities 33
14 RELEVANT POLICIES 34

15. STATUTORY FRAMEWORK.....34
Appendices.....36
Appendix 1: How to make a safeguarding referral.....37
Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.....39
Appendix 3: Local Safeguarding Procedures.....40
Appendix 4: Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting.....42
Appendix 5: Norfolk Safeguarding Adults Board End to End process.....43

1. PURPOSE & AIMS

1.1 The purpose of City College's safeguarding policy is to ensure every child[1] who is a registered student[2] at our college is safe and protected from harm. This means we will always work to:

- Provide help and support to meet the needs of children and young people as soon as problems emerge;
- Protect children from maltreatment, in all environments, including within the home, the community and online.
- Prevent impairment of our children's and young people's mental and physical health or development;
- Ensure that children and young people at our college grow up in circumstances consistent with the provision of safe and effective care;
- Fulfil our safeguarding responsibilities in a way that enables children and young people to achieve the best possible outcomes.

Nb. Throughout this policy, the words 'child' and 'student' refers to any young person under the age of 18 and to any registered student, including vulnerable adults.

When making an external referral on behalf of a vulnerable adult, City College will follow the Norfolk Safeguarding Adults Board process

1.2 This policy will give clear direction to all staff including supply staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our college.

1.3 Our college fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered students at our college. The elements of our policy are prevention, protection and support.

1.4 We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from college or who go missing from education, particularly for prolonged periods and/or on repeat occasions.

Safeguarding Officers will regularly liaise with the DSL(s) to discuss students who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

1.5 This policy applies to all students, staff, parents, governors, volunteers and visitors.

2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our college will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Children at our college will be able to talk freely to any member of staff at our college if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept

[1] For the purposes of this policy 'child' refers to all young people under the age of 18 and vulnerable adults.
[2] Student refers to all students, including vulnerable adults.

safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our college play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are expected to maintain a culture of professional curiosity and an attitude of '*it could happen here*' when considering safeguarding concerns.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

2.3 At City College we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at heart.

2.4 Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

2.5 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, at risk of exploitation, serious violence or modern slavery, and/or they may not recognise their experiences as harmful.

2.6 Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online).

The Personal Development curriculum will cover relevant topics in an age and stage appropriate way, enabling students to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources.

The Personal Development curriculum focuses on four key aspects: Responsible, respectful and active citizens, Develop character, confidence and resilience, Next stage ready, Physical, mental and sexual health.

This education is underpinned by the college's student behaviour policies and pastoral support system.

2.7 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from external agencies in line with Working Together to Safeguard Children (2026) and the Norfolk Multi Agency Safeguarding Partnership arrangements.

2.8 As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- is at risk of being radicalised or exploited
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- has a family member in custody, or is affected by parental offending
- there are further indicators that a child may benefit from a coordinated offer of early help

2.9 At City College we understand the importance of working in a way that adheres to the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty
- Data Use and Access Act 2025

This means we do not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

3. ROLES AND RESPONSIBILITIES

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Jennifer Eves Interim Chief Executive Officer and Chief Operating Officer	01603 773302
	Helen Richardson-Hulme Vice Principal Safeguarding Inclusion and Student Services	01603 773070
	Jacky Sturman Executive Manager	01603 773615
	Mat Scott Easton Principal	01603 773512

	Chris Caddamy Executive Director Data, Digital and Transformation	01603 773014
Mental Health Lead	Samara Castro	01603 773879
Safeguarding Officers	Marie Pacey Sam Warner Katie Williams	 07772785346 07717765674
Principal	Jennifer Eves	
Named Safeguarding Governor	Marcus Bailey	c/o Jodie Mitchell 01603 773372
Chair of Governors / Trustees	Marcus Bailey	

3.1 It is the responsibility of *every* member of staff, volunteer and regular visitor to our college to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the students at this college. This includes the responsibility to provide a safe environment in which children can learn.

The Governing Board

3.2 The Governing Board of City College is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Board takes collective responsibility to safeguard and promote the welfare of our students, we also have a named governor who champions safeguarding within the college.

3.3 The Governing Board will ensure that:

- The safeguarding policy is in place, is reviewed annually, is available publicly via our college website and has been written in line with Local Authority guidance and the requirements of the Norfolk Safeguarding Children Partnership policies and procedures;

- The college contributes to inter-agency working in line with Working Together to Safeguard Children (2026);

- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the DSL. There will always be cover for this role (e.g. DSL rota and confidential shared mailbox). The role will be evidenced explicitly in the role holder's job description.

- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the college's

safeguarding response for those students who are absent from education as detailed in section 6 of this policy.

- All staff undertake appropriate child protection training that is updated annually and online safety training;

- In terms of filtering and monitoring there is consideration to the number of and age range of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

- Ensuring that appropriate filtering and monitoring arrangements are in place and annually reviewed by SLT member responsible for filtering and monitoring. Responsibility to ensure cyber security systems are in place.

- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;

- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE (2026);

- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The Governing Board will receive a safeguarding report at each meeting of Curriculum & Standards Committee that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the college. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual students.

The Principal

3.5 At City College the Principal is responsible for:

- Identifying a senior member of staff from leadership team to be the DSL.
- Identifying alternate members of staff to act as the DSL in his/her absence to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff or volunteer.

The Designated Safeguarding Lead (DSL)

3.6 The DSL is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our college. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children Safe in Education'*.

Safeguarding Officers

3.7 In our College, DSLs are supported by a team of Safeguarding Officers. The Safeguarding Officers will:

- Report to the senior member of staff with lead responsibility
- Ensure that the College's policies, systems and procedures for protecting children and vulnerable adults and for safe recruitment of staff are robust and conform to current legislation
- Raise awareness within the College of issues relating to the welfare of children, young people and vulnerable adults and promote a safe environment for learning within the College
- Refer to cases of suspected abuse or allegations to the relevant investigating agency
- Maintain a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Liaise with secondary and feeder schools to ensure that appropriate arrangements are made for the students
- Provide advice, guidance and support to teaching and support staff on issues relating to child protection and safeguarding
- Deal with individual cases, including attending case conferences and review meetings as appropriate
- Receive training in child protection issues and inter-agency working, and will receive refresher training at least every 2 years
- Deliver staff training in child protection and safeguarding issues at induction and as part of the staff development mandatory programme
- Attend multi-agency meetings including Child Planning meetings.

3.8 The DSL[3] and Safeguarding Officers will provide advice and support to staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing or on the safeguarding system and given to the DSL or Safeguarding Officer.

3.9 During term time the DSL and or a deputy will always be available (during college or college hours) for staff in the college or college to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the college site in person, we will ensure that they are available via telephone and/or any other relevant media.

3.10 The DSL and/ or Safeguarding Officerat City College will represent our college at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSL and/ or Safeguarding Officer will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

3.11 The DSL will maintain records and child protection files ensuring that they are kept confidential and stored securely (see section 7 for more information.)

3.12 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection

[3] DSL and Safeguarding Officers may provide support and advice to staff, as with 3.9-3.10.

information during induction and have been trained within the college to the agreed college's safeguarding training package.

3.13 The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.

3.14 The DSL(s) will work with the principal and senior leaders, 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.

3.15 This will include 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.

3.16 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

3.17 The DSL will take the lead responsibility for understanding the filtering and monitoring systems and processes in place at the college.

4. TRAINING & INDUCTION

4.1 When new staff join our college they will be informed of the safeguarding arrangements in place. They will be provided with an online copy of our college's safeguarding policy along with the staff code of conduct, Part one of 'Keeping Children Safe in Education' where staff are expected to read Part 1 in full and told who our DSL Deputy DSLs and Safeguarding Officers are.

They will also receive a copy (online) of the key behaviour policies including attendance and achievement. All staff are expected to read these key documents. They will also be provided with information about how to record and report safeguarding concerns.

Staff will receive:
New staff welcome email
Safeguarding News emails and staff bulletins
Mandatory Safeguarding training, accredited by the NSCP
County Lines training
Prevent training

How to report a safeguarding concern is included at Induction and Safeguarding training.

4.2 Every new member of staff, volunteer or trainee teacher will receive safeguarding training during their induction period within 3 months of joining the college; training is updated annually to reflect changes in Part 1 of KCSiE (2026).This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the DSL and Safeguarding Officer.

The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive online safety training, including understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as this is part of the overarching safeguarding approach of our college.

4.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of 'Keeping Children Safe in Education (2026)'. To achieve this, we will ensure that:
all members of staff will undertake appropriate safeguarding training or updates on an annual basis, and we will evaluate the impact of this training;
all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

4.4 All regular visitors, temporary staff and volunteers to our college will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is. (See Appendix 2).

4.5 The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Norfolk Safeguarding Children's Partnership at least once every three years. The DSL alternate(s) and safeguarding officers will attend DSLtraining provided by the Local Authority every two years. In addition to formal training, DSLs will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

DSLs read and disseminate e-courier bulletins, NSPCC CASPAR updates and other safeguarding national and local updates to staff. The Safeguarding team attend at DSL network meetings, Local Safeguarding Children's Groups and undertake personal development.

4.6 Our Governing Board will also undertake appropriate training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole college approach to safeguarding. This training takes place at induction and is updated regularly.
Training for Governors to support them in their safeguarding role is available from Norfolk Governor Services.

4.7 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of 'Keeping Children Safe in Education' (2026) provides links to guidance on specific safeguarding issues such as Child Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Partnership and within the Safeguarding Toolkit on the Norfolk Colleges and Learning Providers website.

5. PROCEDURES FOR MANAGING CONCERNS

5.1 City College adheres to child protection procedures that have been agreed locally through the Norfolk Safeguarding Children Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with Norfolk Local Assessment Protocol and the Norfolk Continuum of Need Guidance.

5.2 Every member of staff including volunteers working with children at our college are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL and/ or Safeguarding Officer to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

5.4 It is not the responsibility of college staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

5.5 The Safeguarding Officer should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our college. Any member of staff or visitor to the college who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the Safeguarding Officer or, if unavailable, to the DSL or alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

5.6 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed system in the setting (see Appendix 1 for suggested template). 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 the outcome

5.7 Following receipt of any information raising concern, the Safeguarding Officer will consider what action to take and seek advice from the DSL and/or Norfolk Children's

Advice & Duty Service (CADS) as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.8 All referrals will be made in line with Norfolk Children's Services procedures as outlined in Appendix 3.

5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Norfolk CADS immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Principal. All safeguarding concerns should result in consideration of appropriate intervention, support or risk reduction measures for the child.

5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Norfolk CADS, or the police if:

- the situation is an emergency and the designated senior person, their alternate and the Principal are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety.

5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Norfolk CADS directly with their concerns.

6. SPECIFIC SAFEGUARDING ISSUES

Contextual safeguarding

6.1 At City College we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the college environment and/or can occur between children outside of the college. This is known as contextual safeguarding. It is key that all college staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse, serious violence or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the Safeguarding Officer can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6.2 We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs; and communication barriers
- the need for intimate care. and more likely to be dependent on adults for care
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

6.3 At City College we recognise that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence

6.4 At City College we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual, organised network or gang takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. At City College we recognise victims may identify as part of these groups. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. 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.

6.5 At City College we recognise that Child Sexual Exploitation is a form of child sexual abuse and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact; it can also occur through the use of technology. We understand that some children may not realise they are being exploited e.g. they may believe they are in a genuine romantic relationship.

6.6 At City College we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug/ organised networks or gangs groom and exploit

children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

6.7 We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

6.8 At City College staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We make reference to the Home Office's Preventing youth violence and gang involvement and Child Sexual Exploitation | The Children's Society guidance for more information. Serious violence is seen as a continuing safeguarding concern; Staff are trained and alert to the signs a child may be at risk or involved in serious violence. We are aware there are times of the school day where children may be at higher risk and respond accordingly. Where staff report concerns, the DSL will gather contextual information, provide early support for those considered at risk and dependent on the risk implement a safety and support plan.

6.9 If a child is suspected to be at risk of or involved in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

So-called 'honour-based violence (including Female Genital Mutilation and Forced Marriage)

6.10 At City College we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they should inform the DSL and/ or Safeguarding Officer, who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

6.11 Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to

report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020)

6.12 At City College, we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. The Forced Marriage Unit has statutory guidance and Multi-agency guidelines and can be contacted for advice or more information: Contact 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation and extremism

6.13 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At City College, we will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in college and how to respond when concerns arise.
- There are systems in place for keeping students safe from extremist material when accessing the internet in our college by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our college for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with Norfolk Channel Procedures and will represent our college at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of students.

Child on child abuse including harassment and violence

6.14 At City College all staff are trained so that they are aware that safeguarding issues can manifest themselves via child-on-child abuse. These forms of harm may include an online element which facilitates, threatens and/or encourages abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children,
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,

- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence such as rape, assault by penetration and sexual assault,
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi nudes,
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group).

6.15 We recognise that children are vulnerable to physical, sexual and emotional abuse by other children or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children; and that consensual and non-consensual sharing of nudes and semi-nude images and or videos[4] is a form of child-on-child abuse.

6.16 We understand that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that pupils may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse and they will always challenge this. It must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

6.17 At City College we regularly review decisions and actions, and relevant policies are updated to reflect any lessons learnt. We look out for potential

[4] UKCIS guidance: Sharing nudes and semi-nudes advice for education settings

patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we decide upon an appropriate course of action.

6.18 At City College all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. We will also offer appropriate support to the perpetrator and any other children involved.

6.19 All staff must understand that they will follow our safeguarding procedures and report any incident or concern regarding child-on-child abuse and/ or sexual violence (including Rape, Assault by penetration, sexual assault and causing someone to engage in sexual activity without consent).

The DSL and/ or safeguarding officer will respond to any concerns related to child-on-child abuse in line with guidance outlined in Part five of '*Keeping Children Safe in Education*.' (2026) We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

6.20 We will work with external agencies including Universal Services and Community based Early Help teams and make referrals as appropriate. The college will work with the Police and Children's Social Care as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour whether this occurs online, face to face or both from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren).

6.21 Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in college whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a student discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Norfolk, but the victim must live in Norfolk to access support. The SARC also has a Monday to Friday 9-5 helpline 01603 276381 if students or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The DSL and/ or Safeguarding Officer will always contact the police in cases of rape and serious sexual assault as per the guidance When to call the Police: a guide for colleges and colleges, National Police Chiefs Council.

Modern Slavery
6.22 At City College we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance Modern slavery: how to identify and support victims for concerns of this nature.

Safeguarding responses to children who are absent from education
6.23 At City College we talk to staff about the importance of attendance in relation to safeguarding. Course Leaders have the primary responsibility for following up attendance concerns and for invoking the student attendance and achievement policy.
All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

6.24 At City College we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent from education:

- An attendance register is taken at each lesson.
- We contact parents and carers via text message when their child is absent.
- We hold at least two emergency contact numbers for each of the students on our roll wherever possible.
- Staff will alert the Safeguarding team to any concerns raised regarding children who are absent from college;
- The DSLs will meet regularly with the Safeguarding team to review individual cases to ensure that each response is thorough and takes into account all the relevant information about individual children;
- We will follow the procedures outlined in our attendance and achievement policy to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- When a student leaves college in-year we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files, upon request from the onward provider.

Mental Health
6.25 At City College all staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and can develop into safeguarding concerns. Our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

6.26 We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences, can

impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to a Safeguarding Officer or DSL.

6.27 At City College we have a named Mental Health Lead. There are clear systems and processes in place for identifying possible mental health problems and work with external agencies as required to respond to these concerns.

Online Safety

6.28 At City College all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/ Misandrist messages, the non-consensual making or sharing of nudes and semi-nudes , especially around chat groups, and the sharing of abusive images and pornography.

6.29 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered within this. We will ensure online safety, including teaching that misinformation, disinformation and conspiracy theories are safeguarding harms, is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, staff training, the role and responsibilities of the DSL and any parental engagement.

6.30 **Filtering and monitoring standards for schools and colleges**[5]

Standards

1. You should identify and assign roles and responsibilities to manage your filtering and monitoring system.
2. You should review your filtering and monitoring provision at least annually.
3. Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning.
4. You should have effective monitoring strategies that meet the safeguarding needs of your school or college.

At City College;

- IT Infrastructure team manage the day-to-day running of the web filtering solution. Roles and responsibilities are assigned by the IT Director, with the IT Infrastructure Services Manager taking technical lead on any request for change.

[5] Meeting digital and technology standards in schools and colleges

1.Data Access Request (DAR) forms are used in the event of needing to investigate a user's web history. No disclosures to third parties are conducted without the completion of a DAR. Authorisation of either the IT Director (or senior leadership team member) and Infrastructure Services Manager is required. No unmonitored external access is available to any service provider.The IT Infrastructure Services Manager reviews the filtering solution annually by undertaking a review of the technical requirements and how this relates to the existing solution. This is discussed with the IT Director during regular review meetings and if any changes are needed, authorisation is sought through the senior leadership team.

2.Ensure that a review of their effectiveness is carried out at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of colleges DSL and IT support.

- IT Infrastructure team monitor and manage the day-to-day running of the web filtering solution. All categories such as Legal & Liability issues and adult content are blocked as harmful and inappropriate. At no stage are filters put in place to impact teaching and learning, however false positives can occur with any system.
- Where this is highlighted (usually by raising of a service desk ticket), action is taken by the IT team to investigate and remediate, which could be for a single webpage or an entire website URL.
- The solution works on a Who, What, Where, When, Action basis meaning a granular set of policies apply. This can mean for example school visitors can be filtered differently to HE students.
- Where additional requests from academic staff is required for learning, such as a learning module about drug abuse (which would usually be blocked), solutions are put in place to temporarily grant access based on the user(s) and/or location and/or time/day. This will usually be based on students being fully supervised by the academic requesting the access.
- Filtering reporting and monitoring is used by the IT team to inform DSLs where concerns arise in relation to safeguarding.
- The system uses trend analysis to monitor issues such as radicalisation. Where red flags are raised by the system, these are escalated to the safeguarding team. Within the last year no relevant escalations have taken place.
- It should be noted filtering is not possible on personal devices that are using cellular data connections (such as 4G).

3.It should also be noted, no systems are in place to monitor none-internet based activity, such as key logging / monitoring what is typed within offline documents.

- The DfE has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely and

explains how filtering and monitoring requirements apply to the use of generative AI in education.

More details can be found in our policies on Online Safety and Mobile and Smart Technology which consider the 4Cs, content, contact, conduct and commerce and reflect the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G).

6.31 At City College we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children and vulnerable adults face in our setting.

Cybercrime

6.32 We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). We are aware of the Cyber security standards for schools and colleges.GOV.UK.

6.33 If there are concerns about a child in this area, the DSL will consider a referral to the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic Abuse

6.34 At City College all staff are aware that 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. We understand that children can be victims of domestic abuse. Where they see, hear or experience the effects this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. We are aware of the Norfolk Integrated Domestic Abuse Service (NIDAS) and signpost victims to the service. Norfolk and Suffolk Victim Care are available to offer support where threshold for NIDAS support has not been met.

Children with special educational needs and disabilities or physical health issues

6.35 At City College we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- The need for intimate care and being more likely to be dependent on adults for care
- communication barriers and difficulties in managing or reporting these challenges.
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in college

6.36 We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Children who are lesbian, gay, bisexual, transgender or questioning their gender

6.38 The fact that a child or a young person may be lesbian, gay, bisexual transgender or questioning their gender is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education' (2026), we recognise that these children and in some cases children who are perceived by other children to be lesbian, gay bisexual, transgender or questioning their gender can be just as vulnerable as children who are. The college is aware of the particular vulnerabilities of children who have fully socially transitioned from an early age or may be living in 'stealth'. Therefore, we work to reduce any additional barriers faced and provide a safe space for these children to speak out or share their concerns with members of staff. Through our curriculum, we counter homophobic, BI phobic and transphobic bullying and abuse.

7. RECORDS AND INFORMATION SHARING

7.1 If staff are concerned about the welfare or safety of any child at our college, they will record their concern using our electronic system. Any concerns must be recorded and submitted through the college safeguarding recording system without delay.

7.2 Any information recorded will be kept in a separate named file, in a secure cabinet if a paper system is used and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information

will only be shared within college on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

7.3 Child protection information will be kept up to date. Every safeguarding concern recorded 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 the outcome.

At City College we will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This includes instances where referrals were or were not made to another agency such as the Children's Advice and Duty Service or the Prevent programme. Invitations to child protection conferences, core groups and all other multi-agency meetings and minutes taken at these will be stored on the child's file whether an electronic or paper system is used. All our safeguarding records will include; a chronology, contents front cover and will record significant events in the child's life.

7.4 When a child leaves our college, the DSL will send the safeguarding file, upon request from the receiving post-16 provider. Once enrolment is complete, the College will write to all feeder schools and providers to request the child protection file for young people. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

7.5 We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving college and/or evidence of recorded delivery. The college will maintain an auditable record of safeguarding file transfers and receipt confirmation and seek clarification with previous setting if there are gaps in the safeguarding record.

7.6 Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new college or post-16 training provider in advance to help them put in place the right support to safeguard this child.

8. WORKING WITH PARENTS & CARERS

8.1 City College is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

8.2 When new students join our college, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the college website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child

protection enquiries and what happens should we have cause to contact Norfolk Children's Advice & Duty Service.

8.3 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

8.4 Wherever appropriate, the college will discuss safeguarding concerns with the parent and carers unless doing so would place a child or another person at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the college has about a child will not prevent the DSL and/ or safeguarding officer making a referral to Norfolk CADS in those circumstances where it is appropriate to do so.

8.5 In order to keep children safe and provide appropriate care for them, the college requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).
- Full details of any other adult authorised by the parent to collect the child from college (if different from the above).

The College will retain this information on the student file. The college will only share information about students with adults who have parental responsibility for a student or where a parent has given permission, and the college has been supplied with the adult's full details in writing.

8.6 At City College we are working in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to students who have experienced domestic violence in their household; this scheme is called Operation Encompass. To achieve this, Norfolk Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our students has been present with the DSL(s). On receipt of any information, the DSL will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the 'Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

9. CHILD PROTECTION CONFERENCES

9.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm.

A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

9.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the college in respect of individual children. Usually, the person representing the college at these meetings will be the Safeguarding Officer or DSL. In any event, the person attending will need to have as much relevant and up to date information about the child as possible; any member of staff may be required to contribute to this process.

9.3 All reports for child protection conferences will be prepared in advance using the guidance and template report provided by the Norfolk Safeguarding Children Partnership. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional, and intellectual development and the child's presentation at college. In order to complete such reports, all relevant information will be sought from staff working with the child in college.

9.4 The College recognises that child protection conferences can be challenging and distressing for parents and carers. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents.

10. SAFER RECRUITMENT

10.1 We will ensure that the Principal and at least one member of the Governing Board have completed appropriate safer recruitment training. At all times the Principal and Governing Board will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2026). At least one person involved in conducting an interview will have received safer recruitment training.

10.2 At City College we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities.

10.3 We require details of a candidate's present (or last) employment and reason for leaving; full employment history, (since leaving college, including education, employment and voluntary work) including reasons for any gaps in employment and evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, and shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

10.4 At City College we use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the

interview panel, and any potential areas of concern are explored to determine the applicant's suitability to work with children.

10.5 We will undertake Disclosure and Barring Service checks and other pre-employment checks as outlined in *'Keeping Children Safe in Education'* to ensure we are recruiting and selecting the most suitable people to work with our children.

10.6 We will maintain a Single Central Record (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

10.7 At City College we recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Further information about all of these processes can be found in our Recruitment and Selection policy.

11. SAFER WORKING PRACTICE

11.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

11.2 All staff will be provided with a copy of our college's code of conduct at induction. They will be expected to know our college's Code of Conduct and policy for positive handling and carry out their duties in accordance with this advice. There are limited circumstances when it is appropriate for staff in schools to use 'reasonable force' to safeguarding children, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for safe restraint must be adhered to. A list of staff that have accessed Norfolk Steps training will be kept within the Training and Development team.

11.3 If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in college, who they are with and for how long. Staff should avoid working with students in isolated environments wherever possible and should ensure professional visibility is maintained.

11.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in 'Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (February 2022). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

11.5 Work placements
Where students' courses involve an element of work experience, the workplace provided for this experience will be assessed by a member of the Health and Safety team to ensure it as a minimum meets the requirements of the ESF recommendations.

The workplace assessors are all competent to undertake these assessments and all hold a NEBOSH General Certificate in Health and Safety. The College will brief employers on safeguarding before work placements take place.

Work based assessors support students on work placement and follow the same college safeguarding referral process if they have a concern or receive a disclosure from a young person.

11.6 Health and Safety
The College will ensure a safe learning environment and the promotion of safe working practices.

Through the College's comprehensive Health, Safety and Welfare policy, safe working practices are promoted across the College, work environments are equipped with work equipment that has been provided from reputable sources and is well maintained and working environments are all assessed by staff, supported by competent health and safety advice from a dedicated health and safety department. This includes the assessment of any field trips or extra curricula activities.

12. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

Allegations that may meet the harms threshold
12.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our college. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

12.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in *'Working Together to Safeguard Children' (*2023) and *'Keeping Children Safe in Education'*, DfE (2026) below. An allegation may relate to a person who works / volunteers with children who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The 4th bullet point above recognises circumstances where a member of staff (including supply teachers and/ or trainee teachers) or volunteer is involved in an incident outside of college/college which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

12.3 At City College we recognise our responsibility to report / refer allegations or behaviours of concern and / or harm to children by adults in positions of trust who are not employed by the College to the LADO service directly at lado@norfolk.gov.uk These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

12.4 We will take all possible steps to safeguard our children and to ensure that the adults in our college are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol Allegations Against Persons who Work with Children and Part 4 of *'Keeping Children Safe in Education'*, DfE (2026) are adhered to and will seek appropriate advice. The first point of contact for colleges regarding concerns and/ or allegation issues (including for supply teachers) is via the Local Authority Education Duty Desk on 01603 307797. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service, then the LADO referral form should be completed. The completed LADO referral form is then sent via e-mail to: LADO@norfolk.gov.uk. See Appendix 4 for further details.

12.5 If an allegation is made or information is received about *any* adult who works, volunteers (including trainee teachers) in our setting which indicates that they may be unsuitable to work / volunteer with children, the member of staff receiving the information should inform the Principal immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Principal, this will be reported to the Chair of Governors. In the event that neither the Principal nor Chair of Governors is not contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal or the Vice Chair of Governors.

12.6 The Principal or Chair of Governors will seek advice from the Education, Quality Assurance, Interventions and Regulation Service (EQAIRS) in relation to advice including whether a referral to the LADO service is required, within one working day. No member of staff or the Governing Board will undertake further investigations before receiving advice from the LADO.

12.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the college

is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the College will usually take the lead in conducting an investigation as we have direct access to any affected children and other college staff to collect the facts.

12.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors should contact the LADO directly via email to lado@norfolk.gov.uk.

12.9 Further information and guidance documents in relation to the LADO process, forms, leaflets and the Allegations against Persons who Work/Volunteer with Children Procedures are found on the Norfolk Safeguarding Children Partnership website. Further national guidance can be found at: Advice on whistleblowing. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

12.10 The College has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The College must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first.

Concerns that do not meet the harm threshold

12.11 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. In Norfolk the 'low level' concern process is to consult with the Local Authority Education Duty Desk on 01603 307797. At City College we recognise a low-level concern to be something which 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.

In such cases where a concern appears to be low-level in nature, the College will conduct basic enquiries to establish the facts and will consult with the

EQAIRS Local Authority Education Duty Desk within **5 working days.** Nb for any allegations that may meet the harm threshold, the College will seek advice within 1 working day.

12.12 At City College we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college(including supply teachers, trainee teachers, volunteers and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting and these types of concerns in writing.

12.13 At City College staff report all low-level concerns to the Principal. If reported to the DSL, then the DSL will inform the Principal of the concern in a timely fashion. The Principal will always be the ultimate decision maker in respect of all low-level concerns.

12.14 Through training and induction, we ensure that all staff understand the importance of self-referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

12.15 At City College we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on 01603 307797. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

12.16 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

13. Use of premises for non-college activities

13.1 Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements as per the DfE guidance Out-of-school settings: safeguarding guidance for providers are in place to keep children safe.

13.2 We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any

transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

13.3 If an allegation is made relating to an incident that happened when an individual or organisation was using college premises for third-party or community activities taking place on college premises, we will follow the safeguarding policies and procedures, included in Section 12 above.

14 RELEVANT POLICIES

14.1 To underpin the values and ethos of our college and our intent to ensure that students at our college are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Anti-Bullying and Harassment
- Behaviour which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Recruitment & Selection which adheres to Part 3 of Keeping Children Safe in Education' (2026)
- Whistleblowing
- Attendance and Achievement
- Online Safety
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- First aid, wellbeing, medical support and unwell students
- Field trips, visits and extra-curricular activities
- Teaching, Learning and Assessment

15. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children DfE (2026)
- Keeping Children Safe in Education DfE (2026)
- Working Together to Improve School Attendance, DfE (2026)
- Norfolk Safeguarding Children Partnership procedures
- Norfolk Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (Feb 2022)
- What to do if you're worried a child is being abused DfE (March 2015)
- Information sharing: advice for practitioners providing safeguarding services
- The Prevent duty: Departmental advice for schools and childcare providers DfE (September 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (September 2023)
- Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (January 2020)

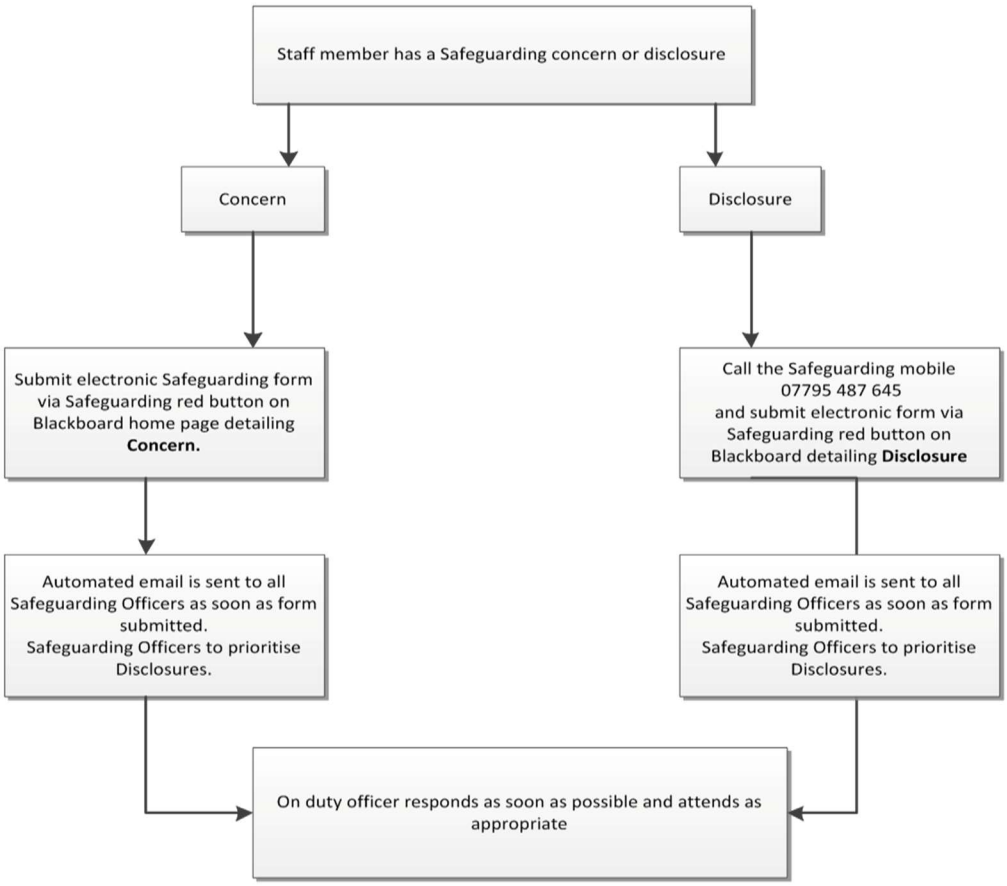
- Multi-agency practice principles for responding to child exploitation and extra-familial harm
- Child sexual exploitation: guide for practitioners DFE (February 2017)
- Teaching online safety in school DfE (January 2023)
- Mental Health and Behaviour in Schools DfE (November 2018)
- Data protection: toolkit for schools DfE (2026)
- Promoting the education of children with a social worker (March 2025)
- Preventing youth violence and gang involvement
- Criminal exploitation of children and vulnerable adults: county lines
- Relationships Education, Relationships and Sex Education (RSE) and Health Education
- Domestic Abuse Act 2021 Statutory Guidance (Home Office April 2023)
- Allergy safety in schools - GOV.UK DfE (July 2026)

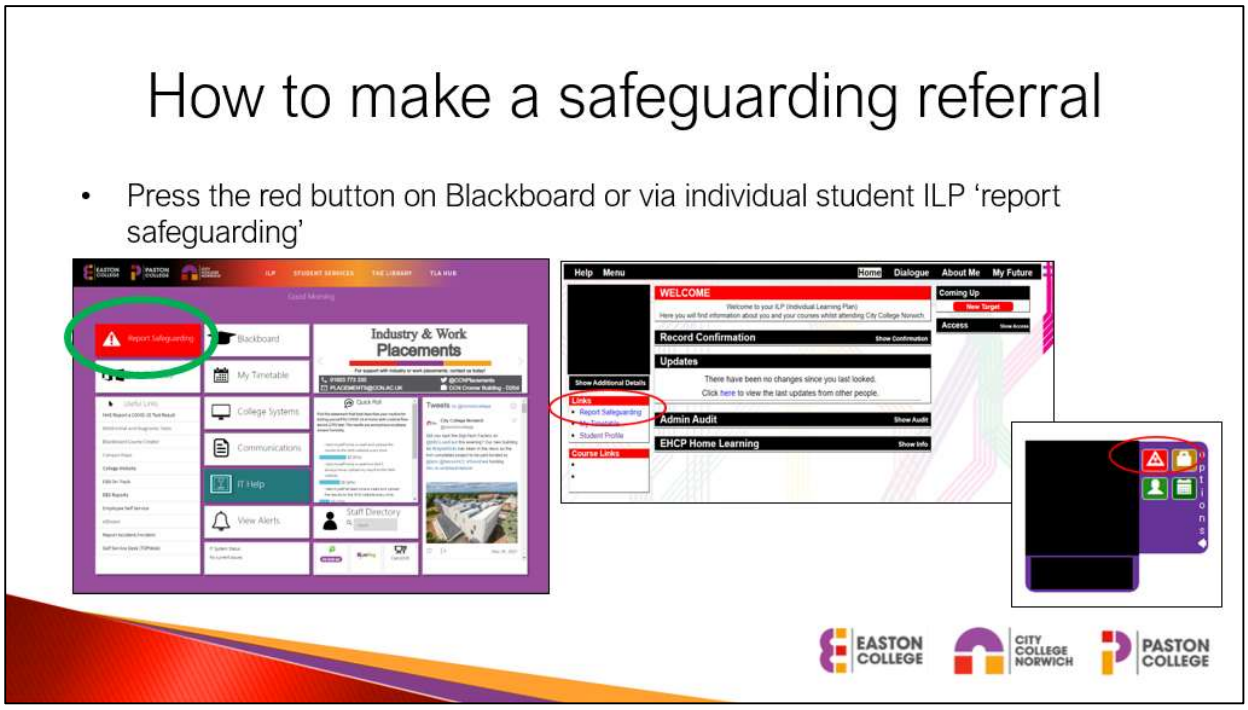
Appendices

- Appendix 1: How to make a safeguarding referral
- Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers
- Appendix 3: Local Safeguarding Procedures
- Appendix 4: Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting
- Appendix 5: Norfolk Safeguarding Adults Board End to End process

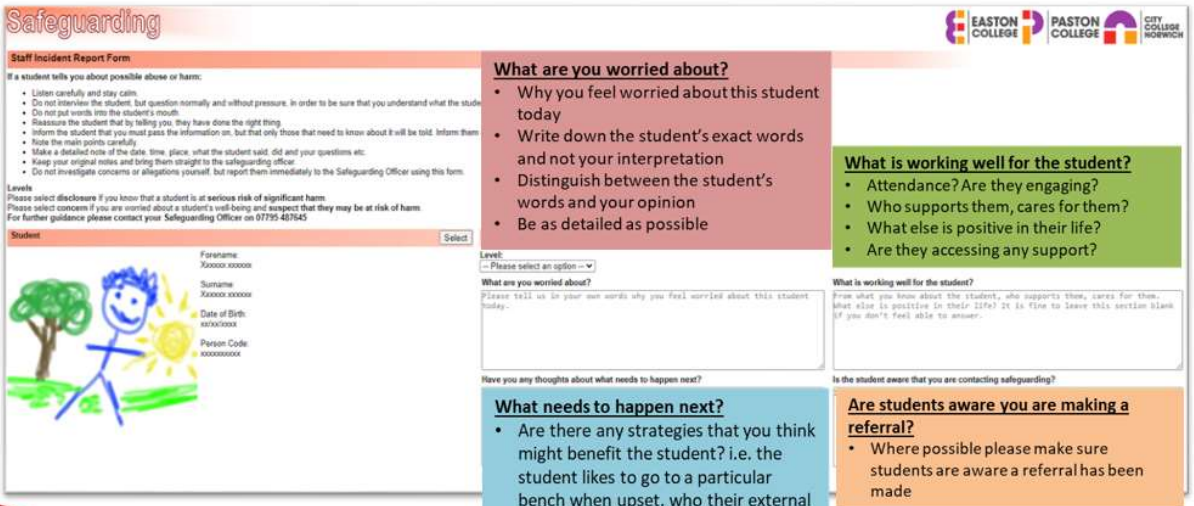
Appendix 1: How to make a safeguarding referral

All referrals about a student need to be reported via the Safeguarding system, Report Safeguarding on Blackboard or via the student's ILP:





You will be asked some prompt questions in your referral



Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers

We all have a statutory duty to safeguard and promote the welfare of children, and at our college we take this responsibility seriously.

If you have any concerns about a child or young person in our college, you must share this information immediately with our DSL, safeguarding officer or one of the alternate post holders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern.

If you are unable to locate them, ask a member of the college office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation or low-level concern about a member of staff, a child's foster carer or a volunteer should be reported immediately to the Principal. If an allegation is made about the Principal, you should pass this information to the Chair of the Governing Board. Alternatively, you can contact the Local Authority Duty Desk on 01603 307797. NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail:help@nspcc.org.uk.

To contact our Safeguarding Team
Email: safeguarding@ccn.ac.uk
Telephone: Central Safeguarding 07795487645

Designated Safeguarding Leads are:

Helen Richardson-Hulme
Jacky Sturman
Mat Scott
Chris Caddamy
Jen Eves

Appendix 3: Local Safeguarding Procedures
Appendix 3: Children's Advice and Duty Service
Safeguarding process**:**

1. **Identify & Assess Risk**: Identify child at potential or actual risk.
2. **Consult DSL**: Report concerns to your organisation's Designated Safeguarding Lead and document them (e.g., CPOMS) and follow advice regarding contacting CADS or completing a Request for Support.'
3. **Immediate Protection**: If the child is in immediate danger, call 999.
4. **Contact CADS if child protection or immediate safeguarding concerns**.
5. **Professionals** call **0344 800 8021** and choose from the following options:
   Press 1 – if the child or young person is currently being supported by a Social Worker or Family Practitioner.
   Press 2 – if your call relates to Child Exploitation.
   Press 3 – if your call relates to Domestic Abuse.
   Press 0 – for Child Protection and immediate safeguarding concerns.
   (If the lines are busy and your call is not answered within 40 minutes, a call back option will be offered).
   To use the service, **members of the public** can call the Customer Service Centre number **0344 800 8020**.
6. **Request Support for Universal, Community based Early Help and Family Help Complete a Request for Support form:**
   Targeted early help and community-based support can be accessed via Request for support - Norfolk County Council. Early Help is designed to support children, young people, and families experiencing difficulties that may affect their wellbeing, development, or ability to flourish.
   Consent: Inform parents/carers of the concerns and gain consent for support from Early Help services, prior to a call or completing a Request for Support unless doing so places the child at further risk.
   Universal services and community-based early help
   Universal outcomes and community based early help provide preventative support for children and families of all ages, strengthening resilience, improving outcomes, and reducing the risk of needs escalating. Delivered as a coordinated local system rather than a single service, this support is offered through universal provision such as education, health, and wider community services.
   It includes services like Best Start Family Hubs, youth, and housing support, and after school provision.
   Best Start Family Hubs offer a clear pathway from pregnancy to age 19 (or 25 for young people with SEND), bringing together multi agency partners to provide accessible, ongoing community support and to safeguard families, including those transferring from targeted or specialist services.
   Family Help – targeted early help, safeguarding, and promoting the welfare of children.

Family Help is offered where universal services and community based early help have not achieved sufficient or sustained improvement, or where a child and family present with multiple, complex, or escalating needs. Delivered through a coordinated, multi-agency approach led by Children's Services and its partners, Family Help provides structured support to address identified risks and concerns. Family Help will only be initiated where there is an agreed Family Plan, or a Graded Care Profile (GCP) in cases of neglect, which has been shared with CADS.

Family Help is a voluntary, consent-based approach that supports families to build capacity, improve outcomes, and reduce risks, including families in kinship arrangements and those requiring additional support during pregnancy, with the aim of preventing the need for statutory child protection intervention.

Consent: Inform parents/carers of the concerns and gain consent for support from Early Help services, prior to a call or completing a Request for Support unless doing so places the child at further risk.

7. **CADS:** A member of the team responds to the call or Request for Support and decides on next steps.
8. **Information Gathering**: MASH partners (police, health, social care) share information if required.
9. **Outcome & Action:**
   Information, advice, and guidance
   Community based Early Help
   Family Help
10. **Feedback:** Following a call CADS provides feedback to the referrer regarding the outcome.

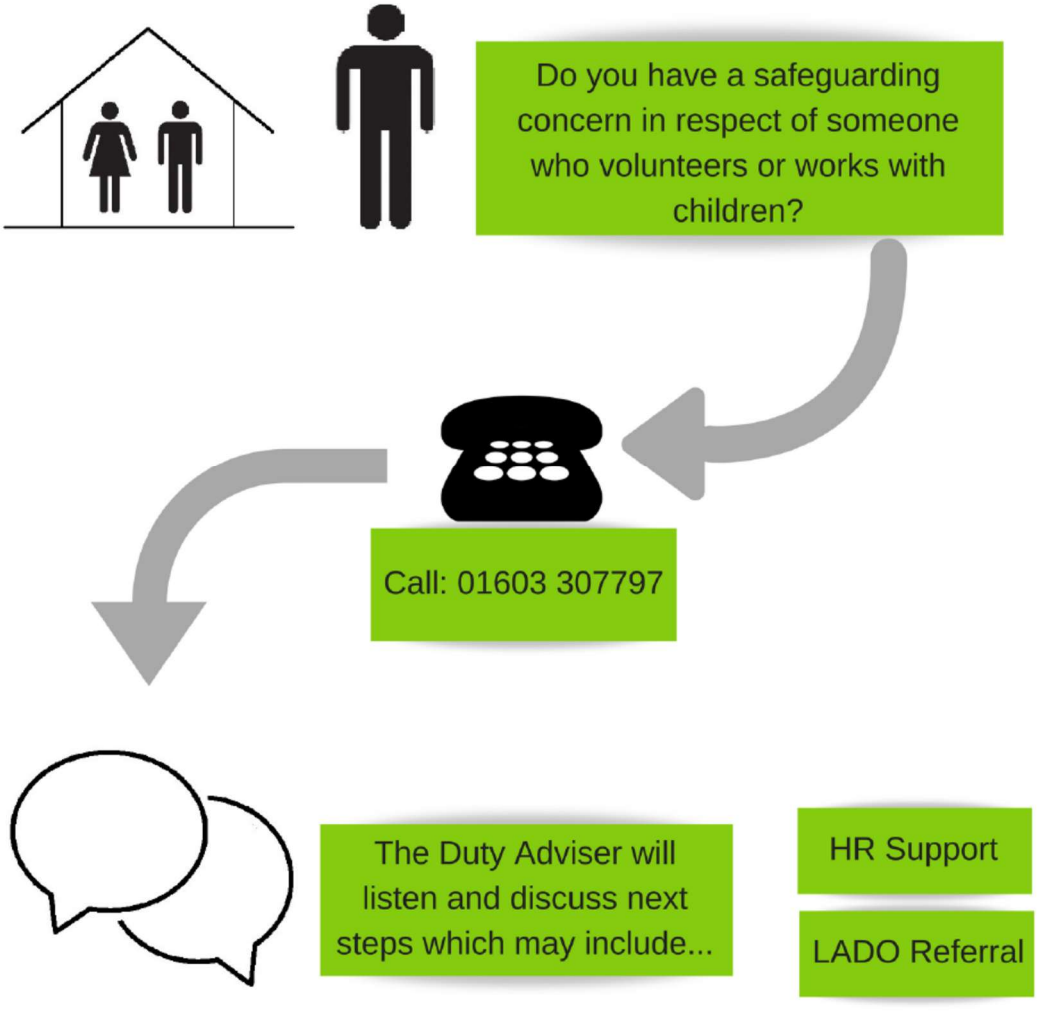
Appendix 4: Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting.

Norfolk County Council

Guidance for Schools, Colleges & Alternative Education Providers

Education Quality Assurance & Intervention Service

Duty Desk



Appendix 5: Norfolk Safeguarding Adults Board End to End process

