

# **Children and Vulnerable Adults Safeguarding Policy 2025/2026**

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## 1. Introduction

The City of Portsmouth College is committed to safeguarding and promoting the welfare of students, apprentices, and vulnerable adults.

Safeguarding and promoting the welfare of young people is **everyone's** responsibility. **Everyone** who comes into contact with young people and their families has a role to play.

Safeguarding determines the actions that the College takes to keep students, apprentices, and vulnerable adults safe and protect them from harm. The actions listed are essential components of the College's safeguarding duty:

- To prevent harm
- To promote wellbeing
- To create safe environments
- To educate on rights, responsibilities, and respect
- To respond to all issues, vulnerabilities and specific concerns raised

The College recognises that the welfare of the student is paramount and will work closely with young people, vulnerable adults, identified next of kin and any other appropriate agencies to promote the welfare of individuals. Additionally, the College fully engages with the locally agreed multi-agency safeguarding arrangements, known locally as the HIPS (Hampshire, Isle of Wight, Portsmouth and Southampton) which are explained here; <https://hipsprocedures.org.uk>.

The College stance is '**it could happen**' and is promoted by all, fostering a culture of transparency and information sharing to create a safe and secure environment for all.

All staff, governors and volunteers are required to have an awareness and refer to the DfE Data Protection guidance to ensure all who work with young people and vulnerable adults have a comprehensive understanding of data protection requirements and compliance, including in relation to the safeguarding of young people and vulnerable adults. It is recognised that the safety of our students, apprentices and vulnerable adults is crucial and that the Data Protection Act and GDPR should not hinder the sharing of information for safety purposes and the sharing of information should not impede the essential task of safeguarding.

The College requires all staff to demonstrate high standards in their management of risk and in the active protection of children, young people and vulnerable adults from discrimination and avoidable harm. Staff are required to fulfil their duties for children and young people under 18 in accordance with the Children Acts 1989 and 2004, for all students fulfil their duties under Keeping Children Safe in Education (September 2024), The Prevent Strategy and Duty (Counter Terrorism and Security Act 2015) and support vulnerable adults in accordance with the National Framework of Standards for Safeguarding adults (ADSS, 2005).

## 2. Purpose

This policy provides a framework for staff, volunteers, and governors to ensure the safety and protection of all students, apprentices, and vulnerable adults. Additionally, the policy is in place to inform next of kin and any other persons who may support a young person or vulnerable adult how the College will safeguard their child, young person, or vulnerable adult whilst in the College's care.

The policy provides a clear direction to all members of the College community to ensure child

protection and vulnerable adults concerns, referrals and monitoring are handled sensitively, professionally and in ways that promote the welfare of students, apprentices, vulnerable adult, and their needs, where all are feel that they are heard and listened to.

The fundamental principles of the policy are underpinned by legislation and a moral responsibility to protect the well-being of students, apprentices, and vulnerable adults who are engaged in educational and training programs at the College. This encompasses on-site and off-site learning, online courses, individuals on work placements, apprenticeships, excursions, and trips.

Through this policy the City of Portsmouth College aims, and are committed to:

- Ensuring the safety of all students, apprentices, and adults, both on and offsite including online learning, work placements, trips and visits, community-based events and those attending our onsite nursery.
- Promote safe practices and challenge poor and unsafe practices.
- Ensure all members of the College community including students, apprentices and adults at risk feel confident to raise safeguarding concerns and for those concerns to be addressed in a professional, timely and sensitive manner.
- Taking the necessary steps to prevent unsuitable individuals from working with our students and vulnerable adults.
- Ensuring all staff receive regular and sufficient training and support in relation to Child Protection, Safeguarding, Online Safety and Prevent.

To meet these aims the board will approve and annually review policies and procedures with the aim of:

- Providing a safe environment for all students, apprentices, and adults to learn.
- Identification of children, young people, apprentices, and adults who may be suffering, or who are suffering significant harm, providing the procedures for reporting such concerns.
- Establishing procedures for reporting and handling allegations of abuse concerning staff members.
- The safe recruitment of all staff.

### **3. Scope**

This policy applies to all students (children, young people apprentices and vulnerable adults), staff, governors, volunteers working for the College in all locations where education and training is delivered to young people, apprentices, and adults. The policy applies to students in the workplace and staff employed directly by contractors supplying services on behalf of the College. Additionally, the policy applies to all visitors at any of the College campuses.

The safer recruitment aspects of this policy apply to all staff, volunteers, and agency workers. Additionally, procedures are in place for subcontractors, partners, and host families.

This policy should be read in conjunction with the following:

- Student Behaviour Policy & Procedure
- Fitness to Study Policy & Procedure
- Student Code of Conduct
- Student Criminal Conviction Declaration & Risk Assessment Policy and Procedure
- Visible ID Policy
- Trips and Visits Policy & Procedure
- Admissions Statement Policy & Procedure

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- Staff Code of Conduct
  - Recruitment and Appointment Policy & Procedure
  - Probation Policy
  - Managing Allegations Against Staff Guidance & Procedure
  - Public Interest Disclosure (Whistleblowing) Policy & Procedure
  - Staff Disciplinary Policy & Procedure
  - Drugs and Alcohol Policy & Procedure (Staff)
  - EED&I (Equality, Equity, Diversity, and Inclusion) Policy
  - Freedom of Speech and External Speaker / Visitor Policy
  - External Lettings Policy & Procedure
  - Serious Incident Management Procedure

All staff must read and understand Keeping Children Safe in Education 2025 part 1. This is statutory guidance from the Department for Education. Keeping children safe in education 2025 ([publishing.service.gov.uk](https://publishing.service.gov.uk)).

The effectiveness of this policy will be kept under continuous review in the light of experience and best practice. Appropriate monitoring will take place through the College's Safeguarding and Well Being Board meetings.

The policy will be subject to annual review and approval by Governors. The review will be initiated by the Designated Safeguarding Lead and will involve consultation with staff, managers, governors, and students where appropriate.

#### **4. Legislation and Guidance**

The City of Portsmouth College Safeguarding procedures have been created in alignment with HIPS (Hampshire, Isle of Wight, Portsmouth, and Southampton) Safeguarding standards. Additionally, in developing the policies and procedures, the City of Portsmouth College Board will consult and consider the guidance provided by the Department for Education and other relevant organisations and groups.

The College recognises its duties under relevant legislation and guidance, as follows:

##### **Legislation**

- Children's Act 1989
- Education and Training Act 2021
- Section 5B of the FGM Act as inserted by section 74 of the Serious Crime Act 2015
- Sexual offences Act 2003
- Human Rights Act 1998
- Equality Act 2010
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- Children's Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Children and Young Persons Act 2008
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Prevent Duty Guidance (2023)

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- Children and Social Work Act 2017
  - Care Act 2014

### Guidance

- Keeping Children Safe in Education 2024
- Working together to safeguard Children 2023
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers 2018
- Prevent Duty in Further Education 2016
- Guidance for safer working practice for those working with children and young people in education settings 2019
- SEND code of practice: 0 to 25 years.
- 'What to do if you are worried about a child being abused' (HM Government, March 2015)
- HIPS (Hampshire, Isle of Wight, Portsmouth, and Southampton) Safeguarding Children Procedures and Practice Guidance 2023
- Hampshire, IOW, Portsmouth, and Southampton 4LSAB Multi-Agency Safeguarding Adults Policy and Guidance 2023.
- Supporting Students with Medical Conditions.
- Meeting Digital and Technology standards in Schools and Colleges 2023 (Updated 2025).
- Supporting Pupils at School with Medical Conditions (2015).

The Children's Act 2014 is fundamental to all who work with children and young people and therefore requires all governing bodies of Further Education Colleges to ensure that their responsibilities are implemented and carried out with the view of safeguarding and promoting the welfare of children and young people.

The Education Act 2002 mandates that governing bodies of Further Education (FE) Colleges must establish and implement measures to safeguard and enhance the well-being of children, young people, and vulnerable adults.

Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2023 is statutory guidance from the Department for Education. The College under this guidance is required to fulfil their duties when carrying out their duties to safeguard and promote the welfare of children.

The College works with the local Prevent board to deliver the Prevent strategy on the following key objectives:

- Ensure that staff and students are aware of their responsibilities in preventing radicalisation and extremism.
- Challenging ideology which supports terrorism.
- Protect and support those who may be at risk of radicalisation or engagement in extreme activity.

- Effectively address any threat posed by individuals supporting or engaging in extremist beliefs or activity.

The College is committed to working with and supporting local children's departments regarding child protection matters and liaising with the LSCP as agreed with the Local Safeguarding Children Partnerships (LSCP) and Local Authority Designated Office (LADO). The College will refer concerns that have been raised regarding a child, young person or adult who might be at risk of significant harm to the appropriate agencies

In the event of a sudden death of a student or adult at risk, the College has responsibility to ensure the correct notification and dissemination of information occurs to prevent any further harm or distress.

## **5. Definitions**

### **5.1 Abuse**

There are five key areas of abuse: neglect, physical, emotional, sexual and exploitation (CSE and CCE). The harm can include witnessing of the ill treatment of others, particularly relevant to when children hear, see or experience domestic abuse and its effects. For further explanations a comprehensive list can be found in Appendix A.

### **5.2 Child**

A 'child' is defined as a person aged up to 18. 'Keeping Children Safe in Education' 2024 recognises the additional vulnerabilities of 'looked after children' and care leavers. The Children Act 2004 also covers vulnerable adults with a disability up to 25. A vulnerable adult is defined as "a person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age, or illness; and who is or may be unable to take care of themselves.

### **5.3 GDPR and Data Protection Statement**

UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 laws are in place to regulate how personal information is handled and protected. If unsure about sharing information, staff should speak to the Safeguarding Team.

### **5.4 HIPS procedures**

The HIPS procedure is the Hampshire, Isle of Wight, Portsmouth, and Southampton (HIPS) safeguarding children procedures manual. All information on the Local Authority Safeguarding Partnerships for both children and adults in the area can be found on the following websites:

- [Hipsprocedure.org.uk](https://hipsprocedure.org.uk)
- [Hampshiresab.org.uk](https://hampshiresab.org.uk)

### **5.5 LADO**

Local Authority Designated Officer for Portsmouth City Council; and Hampshire County Council. The LADO is responsible for coordinating the response to allegations that a staff member who works with young people may have caused or could cause harm in the future.

### **5.6 Student**

A student refers to anyone engaged in education or training at the College including those who are 14-16, young people, apprentices, and adults.



### 5.7 Next of Kin

Next of kin refers to any adult with the capacity to be a primary carer for young people. This can include birth and adoptive parents, stepparents, guardians, foster carers, or other designated family members.

### 5.8 Safeguarding

This is defined in the Children Act 2004 as:

- protecting from maltreatment.
- preventing impairment of mental and physical health and development.
- ensuring that children grow up with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

### 5.9 Safeguarding Team

The team comprises of:

- Designated Safeguarding Lead (DSL) and Vice Principal for Student Experience
- Senior Deputy Designated Safeguarding Lead.
- Head of Safeguarding and Wellbeing and Designated Safeguarding Lead
- 4 x Senior Safeguarding Officers; one per campus.
- 3 x Safeguarding Assistants.
- 1 x Designated Teacher for Unaccompanied Minors.
- 1 x Pre 16 Co-Ordinator.
- All safeguarding staff are trained to DSL level.

### 5.10 Young people

Throughout this document references are made to 'young people.' Although this term refers to those under the age of 18, it also includes the vulnerable adults that study with the City of Portsmouth College or visit the campuses.

## 6. Safeguarding Principles and Inclusive Practices

Safeguarding is **everyone's responsibility**, and all members of the College community should follow the underpinning principle of '**it could happen.**' Based on this the College will focus on the following three key principles:

- Prevent
- Protect
- Support

Safeguarding is everyone's responsibility. The College recognises that persistent or unexplained absence from education constitutes a safeguarding risk. Staff must act in accordance with **Working Together to Improve School Attendance (DfE, 2022 – now statutory)**.

The City of Portsmouth College '**Prevent, Protect and Support**' approach will focus on:

- Practicing safer recruitment for staff and volunteers, ensure that contractors have a DBS, wear the correct lanyard and are aware of the areas of the campus they can access.
- Ensuring the Single Central Record is an updated reflection of staff and reviewed regularly by Vice Principal for Student Experience (DSL), The Director for People and OD and Safeguarding Governor.
- Maintain and review the security of the campuses, Emergency Evacuation Procedure,



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- Lockdown Procedure, and any other drills annually. (Invacuation Procedure)
  - Manage the safety of young people and staff on offsite visits. (Trips and Visits Policy)
  - Regular reviews of the City of Portsmouth College Prevent Risk Assessment.
  - Delivering regular Safeguarding and Prevent Training and updates in line with legal requirements.
  - Identify concerns and reporting procedures.
  - Ensure the College is a safe environment for all, where all feel valued and listened to without judgement.
  - Through the tutor programme as well as curriculum opportunities develop the skills needed for young people to recognise risk and stay safe from abuse.
  - Supporting students who are, or have been, at risk of harm.

## 6.1 Mental Health and Trauma-Informed Practice

### Trauma-Informed Approach to Safeguarding

The City of Portsmouth College recognises that experiences of trauma can significantly impact on a student's mental health, behaviour, and ability to engage with education. A trauma-informed approach is embedded within our safeguarding practices to ensure that all students, apprentices, and vulnerable adults are supported in a way that is sensitive to their experiences.

This includes:

- Creating safe, supportive, and predictable environments.
- Recognising signs of trauma and responding with empathy and understanding.
- Avoiding practices that may re-traumatise individuals.
- Promoting resilience and recovery through positive relationships and inclusive practices.

### Integration of Mental Health and Safeguarding

The College is committed to ensuring that:

- Safeguarding concerns that involve mental health are addressed holistically, with appropriate referrals to internal and external mental health services.
- Staff are supported in recognising when mental health difficulties may be a symptom or result of abuse, neglect, exploitation, or trauma.

There is a clear pathway for collaboration between the Safeguarding Team and mental health professionals, both within the College and through external agencies

## 6.2 Inclusion Safeguarding

The City of Portsmouth College recognises that safeguarding must be inclusive and responsive to the diverse identities and lived experiences of its students, apprentices, and vulnerable adults. An intersectional approach acknowledges that individuals may face multiple, overlapping forms of discrimination or disadvantage that can increase their vulnerability to harm.

The College will ensure safeguarding support is inclusive of **LGBTQ+ and gender-questioning students** and will adapt practice in line with forthcoming Department for Education guidance (expected 2025).

To ensure effective safeguarding for all, the College will:

- Promote a culture of inclusion, respect, and equity across all campuses.

- Ensure safeguarding staff are trained in recognising and responding to intersectional vulnerabilities.
- Collaborate with specialist services and community organisations to provide appropriate support.
- Ensure that safeguarding procedures are accessible and inclusive, including the use of interpreters, alternative communication methods, and culturally competent practices.

### 6.3 Online Safety

The City of Portsmouth College recognises the increasing complexity and significance of online safety in safeguarding children, young people, and vulnerable adults. As digital technologies evolve, so do the risks associated with online environments.

Risks now include exposure to **disinformation, misinformation, and conspiracy theories**, which may undermine wellbeing and increase vulnerability to harm.

The College will:

- Educate students and staff on recognising and responding to disinformation, misinformation, and conspiracy theories.
- Ensure the Designated Safeguarding Lead (DSL) takes lead responsibility for overseeing filtering and monitoring systems, in line with **DfE Filtering and Monitoring Standards (2023)** and **Cyber Security Standards for Schools and Colleges (2023)**.
- Apply the DfE's **Generative AI: Product Safety Expectations (2023)** to ensure the safe and responsible use of AI.

#### **Risks from AI-Generated Content, Deepfakes, and Grooming via Social Media.**

The College acknowledges the growing threat posed by AI-generated content, including deepfakes, manipulated media, and synthetic identities. These technologies can be used to deceive, exploit, or groom individuals, particularly through social media platforms.

To mitigate these risks, the College will:

- Educate students and staff on how to identify and respond to AI-generated threats and misinformation.
- Include awareness of deepfakes and digital manipulation in digital literacy and safeguarding training.
- Monitor and respond to incidents involving online grooming or exploitation, including those facilitated by emerging technologies.

#### **Ethical and Safe Use of AI Tools.**

To ensure responsible use of AI within the College:

- Staff and students will receive guidance and training on the ethical, safe, and inclusive use of AI tools in educational settings.
- AI-generated content must be used transparently, with clear attribution and understanding of its limitations.
- Safeguarding concerns arising from AI misuse (e.g., harassment via AI-generated content) must be reported through the College's safeguarding procedures.

#### **Guidance for Staff and Students on Reporting Online Abuse**

All members of the College community must feel confident in recognising and reporting online abuse, including cyberbullying, harassment, and exploitation.

The College will:

- Provide clear, accessible guidance on how to report online abuse through internal systems such as MyConcern.
- Ensure safeguarding staff are trained to respond to online abuse disclosures sensitively and effectively.
- Promote a culture of openness where students and staff are encouraged to speak up about online concerns without fear of judgement.

## **7. Roles and Responsibilities**

All staff are expected to be aware of the signs and symptoms of abuse, neglect, exploitation and must be able to respond appropriately. All new staff will receive training as part of their Induction, and all staff will receive regular updates, at least annually, on Child Protection, Safeguarding matters and Prevent. The Safeguarding Team will attend refresher training at least every two years.

### **7.1 Students:**

All students are responsible for complying with the College's policies and procedures. All students will receive information on policies, procedures, and the College's safeguarding arrangements during their induction. All students will be made aware of how to raise any concerns they may have about themselves or others.

### **7.2 Parents/Carers/Next of Kin:**

Parents/Carers will be made aware of the College's safeguarding policy, which is also publicly available via the College's website. Parents/Carers/Next of Kin will be made aware of who the Safeguarding Team are and who to contact if they have any concerns relating to their child's safety or wellbeing.

### **7.3 Visitors to the College campus:**

- All visitors are expected to sign in at reception on arrival and will be issued with a visitor's lanyard and a copy of the campus safeguarding leaflet.
- Visiting speakers and other visitors to the campus will need to go through the College's risk assessment process in accordance with our 'Freedom of Speech and External Guest Speaker/Visitor Policy'.
- Similar protocols are in place for those wishing to hire any of the College's facilities and their safeguarding responsibilities. (Refer to External Lettings Policy)

### **7.4 All Staff**

All staff have a responsibility to:

- Be familiar with Part 1 of Keep Children Safe in Education (KCSiE 2025) for staff working.
- Must be alert to students needing early help, particularly if they are persistently absent, at risk of exclusion, or affected by parental/carer/NOK in custody or is affected by parental offending.
- Are responsible for providing a safe environment in which students can learn and should be prepared to identify students who may benefit from early help.
- Establish and maintain an environment where young people feel secure, are encouraged to talk, and are listened to and not judged.
- Ensure they know who the Safeguarding Team are and know how to contact them.
- Be familiar with how to make a safeguarding referral, and any staff member who has a concern about a child's welfare should follow the College's referral processes (MyConcern).
- Maintain an attitude of "it could happen here" with regards to safeguarding.

- Know what to do if a child tells them he/she is being abused, neglected or exploited.
- Recognise the signs of female genital mutilation (FGM) and be aware of their specific legal duty in report such concerns to the police.
- Record all discussions and decisions made, and reason for those decisions via MyConcern.
- Refer any concerns, including low level concerns they may have about any member of staff in relation to the safeguarding of a child, young person, apprentice or vulnerable adult to the College DSL or the Director of People and Organisational development.

### **7.5 Employers/Work Experience:**

All employers who will be supporting a young person, apprentice or a vulnerable adult have a responsibility to:

- Adhere to the College's work placement process, including Health and Safety and Insurance Checks.
- Be aware of safeguarding processes and what to do if they have any concerns prior to any placement starting.
- Adhere to any support plans in place to ensure the safety of the young person, apprentice, or adult student.

### **7.6 Contractors/Consultants/Volunteers and others Working at the College Campus**

- Non-employees working on the College campus must adhere to the College's health and safety and safeguarding requirements. Depending on the nature of the work, location, and duration, certain procedures may be required, such as completing relevant DBS checks, validating a DBS check and other pre-employment screenings, undergoing a risk assessment, and participating in relevant training.
- All unaccompanied non-employees on campus to be approved by HR, with their details recorded on the Single Central Record before they can commence work on campus.
- Where appropriate risk assessments for non-facing roles may be used, but only if approved by the DSL.

### **7.7 Safeguarding Team**

The safeguarding Team, across all four campuses will also have these additional responsibilities:

#### **Managing Referrals**

- Support staff to report concerns via the College reporting mechanism, MyConcern.
- To ensure that there is effective front-line safeguarding support for students and staff.
- Respond appropriately to disclosures or other concerns which relate to the wellbeing and welfare of students in accordance with college policy and procedures.
- Support DDSLs and DSL to promote positive safeguarding procedures and practices within the College.
- Refer cases of suspected abuse to the local authority children's social care as required.
- Refer cases to the Channel programme, in consultation with the DSL, where there is a radicalisation concern as required.
- Refer cases where a crime may have been committed to the Police as required.
- Encourage a culture of listening to young people and take account of their wishes and feelings in any measures the COPC may put in place to protect them.

#### **Working with Others**

- Liaise with staff, Curriculum Managers, Assistant Principals and Vice Principals (where appropriate).
- Liaise with case managers and designated officers at the Local Authority (where appropriate).
- Liaise with Virtual Schools as the Designated Teacher to ensure young people studying at the College are fully supported.

- Liaise with the PCC (Portsmouth City Council) Link Coordinator to further support identified vulnerable students.
- Liaise with external agencies on matters of safety and safeguarding.

### **Training**

- The Safeguarding Team will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- The Safeguarding Team should undertake Prevent Awareness training on an annual basis.
- In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.
- Be alert to the specific needs of young people in need, those with special educational needs and young carers.
- Keep detailed, accurate, secure written records of concerns, including a 'MyConcern added' note on EBS.
- Understand and support the COPC with regard to the requirements of the Prevent Duty.

### **Recording and Monitoring**

- Safeguarding records must include not only concerns, discussions and decisions but also the rationale for decisions taken.
- Keep up to date written records of Safeguarding concerns using MyConcern.
- When a young person leaves the City of Portsmouth College, they ensure their Safeguarding file is transferred to the new college as soon as possible. This should be transferred separately from any other information, ensuring secure transit and confirmation of receipt should be obtained.
- Safeguarding records will be retained until a student reaches their 25th birthday or transfers to another institution.

### **Availability**

- During term time the Safeguarding Team will be available, during college hours, for staff in the College to discuss any safeguarding concerns.
- There will be a Safeguarding Team rota during the holidays, to ensure there is coverage should the need arise.
- If a staff member has a safeguarding concern whilst teaching in the evening, between 1700 – 2100 Monday to Friday the member of staff can contact the published Duty Manager. If the concern is an immediate risk the Duty Manager will contact the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads.
- If a staff member has a safeguarding concern out of college hours, staff will be made aware of the local safeguarding out of hours service, if a student is at immediate risk staff will be made aware to contact 999 and follow up any actions by completing a MyConcern report and with the Safeguarding Team.

## **7.8 Deputy Designated Safeguarding Lead**

- Take operational responsibility for safeguarding on a nominated campus (which may include more than one campus) or to deputise at other campuses.
- Act as a senior adviser for other safeguarding officers, with guidance on cases within the college
- Oversee high level safeguarding cases, liaising with social workers, local authorities, and other agencies, referring any serious cases to the Designated Safeguarding Lead.
- Attend or work with local safeguarding partners on behalf of the DSL.
- Support DSL in raising awareness of safeguarding within the College and promote a culture of safeguarding.



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## 7.9 Designated Safeguarding Lead

The Designated Lead Safeguarding Officer is responsible for safeguarding in the College. The full list of responsibilities required by Keeping Children Safe in Education 2024 is in Annex C.

In summary the Designated Lead Safeguarding Officer will:

- Coordinate safeguarding practices across the College
- Liaise with the Director of People & Organisational Development to deal with allegations against members of staff, contractors, and volunteers
- Consult with the Designated Officer from the relevant Local Authority (LADO) as appropriate, in order to ensure that all allegations against staff, contractors and volunteers are dealt with in an objective and transparent way
- Liaise with the Principal/CEO and/or Deputy Principal/Deputy CEO to inform them of issues especially ongoing enquiries under section 47 of the Children's Act 1989 and police investigations.
- Ensure that the Director of People & Organisational Development records details of any allegations against staff, contractors and volunteers and carries out any agreed actions with the Designated Officer from the relevant Local Authority and reports on outcomes
- Act as a contact person within the College, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the Governing Body) are aware of their role.
- Act as a point of contact and work with local Safeguarding partners
- Liaise with the Deputy CEO to inform them of ongoing enquiries and police investigations. This should include being aware of the requirement for the child to have an appropriate adult.
- Oversee the planning of any curricular or other provision in relation to child protection and safeguarding matters, the PREVENT agenda and online and digital safety.
- Ensure students are aware of the issues around safeguarding and PREVENT, through enrichment and tutorial activities and know who to talk to if they have any concerns
- Ensure that staff are alert to the needs of the most vulnerable, e.g., Looked after Children (LAC), Care Leavers (CL), those aged 14-16 (Y10/11), unaccompanied minors (UAM) and those with special educational needs or disabilities
- Raise awareness about safeguarding and child protection on an on-going basis
- Arrange updates on safeguarding training for staff on an annual basis and induction training on child protection for new staff
- Ensure that the Designated Safeguarding Lead, the Deputy Designated Officers, and the Safeguarding Officers receive updated training on a regular basis, at least annually.
- Ensure that safeguarding records are kept up to date and report to SMT and Governors

## 7.10 Director of People and Organisational Development

The Director of People and Organisational Development will:

- Ensure the safer recruitment of staff and ensure there is an up-to-date central list which shows that appropriate checks have been carried out on all staff, as well as Governors and volunteers. Where individuals have regular, unsupervised access to young people up to the age of 18, these include DBS checks; previously termed CRB checks (for those employed between 2002 and 2013) or List 99 checks (for those employed before 2002) and checks against the Barred list for teaching staff.
- Ensure allegations against staff, including those relating to the harm/risk towards a child, young person, apprentice, or adults are thoroughly investigated in a professional, sensitive, and timely manner, working closely with the DSL and/or Designated Investigating Officer.

## 7.11 Principal/CEO

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The Principal/CEO will:

- Ensure the College policy for Safeguarding children and vulnerable adults and other related College policies and procedures (including the safer recruitment of staff and managing cases of allegations made against staff) are in place and implemented to ensure the welfare of all.
- Delegate operational responsibility and implementation of procedures to a SMT member.
- Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.

### **7.12 Designated Governor**

The Designated Governor will:

- Work closely with the DSL to ensure that the College's policies and procedures are consistent with the LSCP's procedures.
- Appropriate and regular training is undertaken.
- Attend termly Safeguarding Board meetings and monthly SCR meetings.

### **7.13 The Governing Body**

The Governing Body will ensure that:

- They are familiar with Parts 1 and 2 of Keeping Children Safe in Education (2024).
- The City of Portsmouth College has effective Safeguarding and Child Protection Policies and Procedures, and these are updated annually and available publicly.
- Portsmouth Safeguarding Children Partnership (PSCP) and Portsmouth Adult Safeguarding Board are informed annually about the discharge of duties via the safeguarding audit.
- Recruitment, selection, and induction follows safer recruitment practice.
- Allegations against staff are dealt with in line with the City of Portsmouth College Managing Allegations Against Staff Guidance and Procedure, and the City of Portsmouth College Disciplinary Procedure.
- Staff have been trained appropriately and this is updated in line with guidance.
- Any safeguarding deficiencies or weaknesses are remedied without delay.
- They have identified a nominated Safeguarding Governor responsible for liaising with the DSL on Safeguarding and Child Protection.

## **8. 14 to 16 Provision**

The prime responsibility for safeguarding students aged 14-16 remains with the referring school or authority. However, this does not diminish the obligation of staff to respond promptly and appropriately if a disclosure is made. In such cases, the designated member of the safeguarding team must immediately inform the referring school or local authority to ensure a collaborative and transparent approach.

As an alternative provision provider, we will ensure that when students attend our setting that:

- All staff have working with the 14 -16 provision have undergone the required safeguarding checks, and written confirmation of these checks is provided to schools and/or local authorities.
- Student placements are regularly reviewed in partnership with the schools to ensure they remain safe, appropriate, and supportive of each learner's needs.
- Any safeguarding concerns are acted upon immediately, with placements ended without delay if required to protect student welfare.



## **9. Safer Recruitment**

The College is committed to safeguarding and promoting the welfare of children, young people, apprentices, and vulnerable adults. As part of this commitment, the College ensures that robust safer recruitment practices are in place to prevent unsuitable individuals from working with students.

**9.1** At the City of Portsmouth College all staff, paid or voluntary, are recruited and selected in line with government guidance in 'Keeping Children Safe in Education' (2025).

**9.2** Pre-employment checks include:

- A DBS check, if no DBS a risk assessment is conducted by the DSL and Director of People and Operations
- A Children's Barred List Check
- Qualification Check
- Two references
- Completed Online Safeguarding Training and read KCSiE Part 1
- Verification of identity
- Right to Work in the UK

### **9.3 Single Central Record (SCR)**

The College maintains a Single Central Record (SCR) of all pre-employment checks for:

- Staff (including agency and supply staff)
- Governors
- Volunteers
- Contractors (where applicable)

The SCR is regularly reviewed by the Vice Principal for Student Experience (DSL), the Director of People and Organisational Development, and the Safeguarding Governor.

### **9.4 Safer Recruitment Training**

- At least one member of every recruitment panel will have completed accredited safer recruitment training.
- Training is refreshed regularly to ensure compliance with current legislation and guidance.

### **9.5 Allegations against staff**

- All staff are required to report any safeguarding concerns, including low-level concerns, about colleagues or others working with students.
- The College promotes a culture where concerns can be raised without fear of reprisal, in line with the Whistleblowing Policy.

## **10. Whistleblowing**

As stated in KCSiE 2024, 'all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Groups safeguarding regime and know that such concerns will be taken seriously by the College's Senior Leadership team.' If a member of staff, governor, volunteer, or visitor has concerns about how a potential or actual Safeguarding case is being managed, these should be raised with the Designated Safeguarding Lead in the first instance. If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

## **11. Policy Review and Impact Evaluation**

As a college we are committed to ensuring that its safeguarding policy is not only compliant with statutory requirements but also effective in practice. To achieve this, the College undertakes regular evaluation of safeguarding processes, outcomes, and impact.

### **11.1 Measuring Effectiveness**

The effectiveness of the safeguarding policy will be assessed through a range of key performance indicators (KPIs), including:

- Completion rates of mandatory safeguarding and Prevent training for staff.
- Student and staff feedback on safeguarding awareness and confidence in reporting.
- Audit outcomes from internal and external reviews.

### **11.2 Annual Safeguarding Report**

An annual safeguarding report will be prepared by the Designated Safeguarding Lead (DSL) and presented to:

- The Senior Management Team (SMT)
- The Governing Body

The report will include:

- A summary of safeguarding activity and trends.
- Analysis of case types and outcomes.
- Training and development updates.
- Recommendations for improvement.

### **11.3 Learning from Case Reviews and Audits**

The College is committed to continuous improvement and will:

- Review lessons learned from internal case reviews and external safeguarding audits.
- Implement action plans to address identified gaps or areas for development.
- Share learning across departments to strengthen safeguarding culture and practice.

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## Appendix A: Examples of Abuse (KCSIE 2025)

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation are:

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

**County lines** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line.” This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of gender identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

### **Preventing radicalisation**

(Note: The preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024)

Children may be susceptible to radicalisation into terrorism. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

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

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty. The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **Sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- 
- Increased absence from school
  - A change in friendships or relationships with older individuals or groups
  - A significant decline in performance
  - Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
  - Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
  - The likelihood of involvement in serious violence may be increased by factors such as:
    - being male having been frequently absent or permanently excluded from school.
    - having experienced child maltreatment
    - been involved in offending, such as theft or robbery.

**So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage):** So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse Committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

**FGM mandatory reporting duty for 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, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

**Forced marriage:** 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 and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional, and psychological.

**Mental health:** Where children have suffered abuse, neglect, exploitation, or other potentially traumatic adverse Childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance, and progress at school.

## Appendix B: Safeguarding Policy Addendum 2025

### City of Portsmouth College – Safeguarding Policy Addendum 2025

#### *Summary of Required Updates from KCSIE 2025*

##### Online Safety: Disinformation & AI Risks

- Educate students and staff on recognising and responding to disinformation, misinformation and conspiracy theories. The DSL will lead on filtering and monitoring systems, ensuring compliance with DfE Filtering and Monitoring Standards (2023) and Cyber Security Standards. Generative AI will be used safely in line with DfE product safety expectations.

##### Filtering & Monitoring Systems

- The DSL will lead on the understanding, implementation and oversight of filtering and monitoring systems, and ensure they meet current DfE standards.

##### Attendance as a Safeguarding Concern

- Persistent or unexplained absence from education is a safeguarding concern. Staff must act in line with Working Together to Improve School Attendance (DfE, 2022).

##### Early Help Triggers Expanded

- Staff must be alert to early help needs where students are frequently absent, at risk of exclusion, or affected by parental/carers/NOK are in custody or affected by parental/carers/NOK offending.

##### Abuse Terminology Update

- The College adopts the updated terminology: 'abuse, neglect and exploitation'.

##### Recording Rationale for Safeguarding Decisions

- Safeguarding records will include the rationale for decisions taken, in addition to the concerns, discussions and actions.

##### Alternative Provision Safeguarding

- For alternative provision, the College will provide schools and local authorities with written confirmation of staff safeguarding checks, regularly review placements, and review of any placements if any safeguarding concerns arise.

##### LGBTQ+ & Gender-Questioning Students

- The College will ensure safeguarding support is inclusive of LGBTQ+ and gender-questioning students and will update practice in line with forthcoming DfE guidance.

# **Children and Vulnerable Adults Safeguarding Procedure 2025/2026**



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## 1. Introduction

The City of Portsmouth College is committed to safeguarding and promoting the welfare of students, apprentices, and vulnerable adults. This procedure outlines the steps staff must take measures to ensure the safety and protection of all individuals within the College (Appendix A).

## 2. Disclosures and Referrals

If a student and/or vulnerable adult discloses information to a member of staff, the latter should ensure they listen, and if possible, make notes of what the student has stated. Use the TED technique; Tell, Explain and Describe. Leading questions are to be avoided.

- Staff should take the student to the Safeguarding office if there is a concern of immediate risk of harm. Once the student has been handed over and the staff member has shared their concerns, they will still need to ensure that a MyConcern report is complete.
- If there is not an immediate risk of harm the staff member should complete a MyConcern report with as much information as possible.
- Staff may be contacted by external agencies, such as Children's Services, Police or Health to provide information or to attend a meeting. This will be passed on to the 2.1 Safeguarding Team contacting the relevant agencies. Staff will not get involved in this as they may not have all the relevant information.

### 2.1 Making a Safeguarding Referral (Student Concern)

- If a member of staff has a concern about a student, they have a legal responsibility to ensure that all concerns are reported. All concerns should be reported as follows (Appendix B):
- All concerns are to be reported via the College reporting mechanism, MyConcern through the Staff Hub.
- Click on the red '**Report**' button. The next screen will allow you to start documenting your concerns.
- Detail your concern on the next screen. The information you provide will support the Safeguarding Team in determining the next steps. Continue through the screens until you reach '**Submit**'.

### 2.2 Recording and Monitoring

- The Safeguarding team will keep up to date written records of Safeguarding concerns using MyConcern.
- When a young person leaves the City of Portsmouth College, they ensure their Safeguarding file is transferred to the new college as soon as possible. This should be transferred separately from any other information, ensuring secure transit and confirmation of receipt should be obtained.
- Safeguarding records will be retained until a student reaches their 25th birthday or transfers to another institution.

### 2.3 Safeguarding Reporting

An annual safeguarding report will be prepared by the Designated Safeguarding Lead (DSL) and presented to:

- The Senior Management Team (SMT)
- The Governing Body

The report will include:

- A summary of safeguarding activity and trends.
- Analysis of case types and outcomes.
- Training and development updates.
- Recommendations for improvement.

### 3. Availability and Out of Hours Procedures

During term time the Safeguarding Team will be available, during college hours, for staff in the College to discuss any safeguarding concerns. There will be a Safeguarding Team rota during the holidays, to ensure there is coverage should the need arise. Outside of normal working hours 8:30am to 5:00pm the '**Serious Incident**' Procedure would be implemented as follows:

- A representative of the Estates team and from the Security team will be present onsite from Monday to Thursday, from 5:00pm to 9:00pm and can be reached via the reception radio or at the Estates office.
- In the event of a serious incident, staff should contact the Estates team immediately using one of the methods listed. The Head of Estates will be notified and escalate to other senior members, in accordance with the Serious Incident Management Pack.

When the college is closed and staff/students are unable to access the safeguarding team, they are advised to do the following:

- Monday to Thursday, where there are concerns involving a student, the staff member must contact the on Duty Designated Safeguarding Lead.
- If outside the above hours the member of staff will need to contact MASH (Multi-agency safeguarding hub) for out of hours support or if an emergency, dial 999. Once completed the member of staff will need to complete a My Concern to inform the safeguarding team to ensure the follow-up work by the team can be completed.

### 4. Recruitment and Appointment

At the City of Portsmouth College all staff, paid or voluntary, are recruited and selected in line with government guidance in 'Keeping Children Safe in Education' (2025).

#### 4.1 Pre-employment checks include:

- A DBS check, if no DBS a risk assessment is conducted by the DSL and Director of People and Operations
- A Children's Barred List Check
- Qualification Check
- Two references
- Completed Online Safeguarding Training and read KCSiE Part 1

- Verification of identity
- Right to Work in the UK

## 5. Allegations against Staff

- One of the primary responsibilities of the College is to ensure the safety of the children, young people, apprentices, and adults who study with us. It is essential that prompt and professional action is taken regarding all cases of suspected abuse by a member of staff, whatever the validity. If the risk is deemed significant suspension may be actioned, and this must be made clear to the member of staff; however, suspension is not an indicator of guilt.
- Any allegations against a staff member which includes non-student facing role must be reported directly to Jo Shankland, [joanne.shankland@copc.ac.uk](mailto:joanne.shankland@copc.ac.uk) or Mickiela Blake, [mickiela.blake@copc.ac.uk](mailto:mickiela.blake@copc.ac.uk). If such concern meets the LADO threshold, the LADO must be informed within 24hrs of the concern/allegation being raised.

## 6. Allegations against Employers

- Employers and their staff play a key part in supporting, delivering education and training for the College. Any cases of suspected abuse by an employer or their staff must be investigated quickly and professionally, whatever the validity.
- The Designated Safeguarding Lead (DSL) has the right to pause the placement with an employer whilst an investigation takes place. If suspected abuse by an employer is reported to any member of the College team, it is the responsibility of the staff member to bring such concerns to the Designate Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSL) or the Safeguarding Team.

## 7. Whistleblowing Procedure

The City of Portsmouth College is committed to the highest standards of openness, integrity, and accountability. All staff, volunteers, and contractors have a duty to report concerns they may have about the safety and welfare of children, young people, or vulnerable adults, including concerns about the conduct of colleagues or other professionals including raising concerns about malpractice, wrongdoing, or failures in safeguarding practice, without fear of reprisal or victimisation.

Whistleblowing concerns may include, but are not limited to:

- Inappropriate behaviour or conduct by a staff member, volunteer, or contractor.
- Failure to follow safeguarding procedures or policies.
- Attempts to cover up wrongdoing or malpractice.

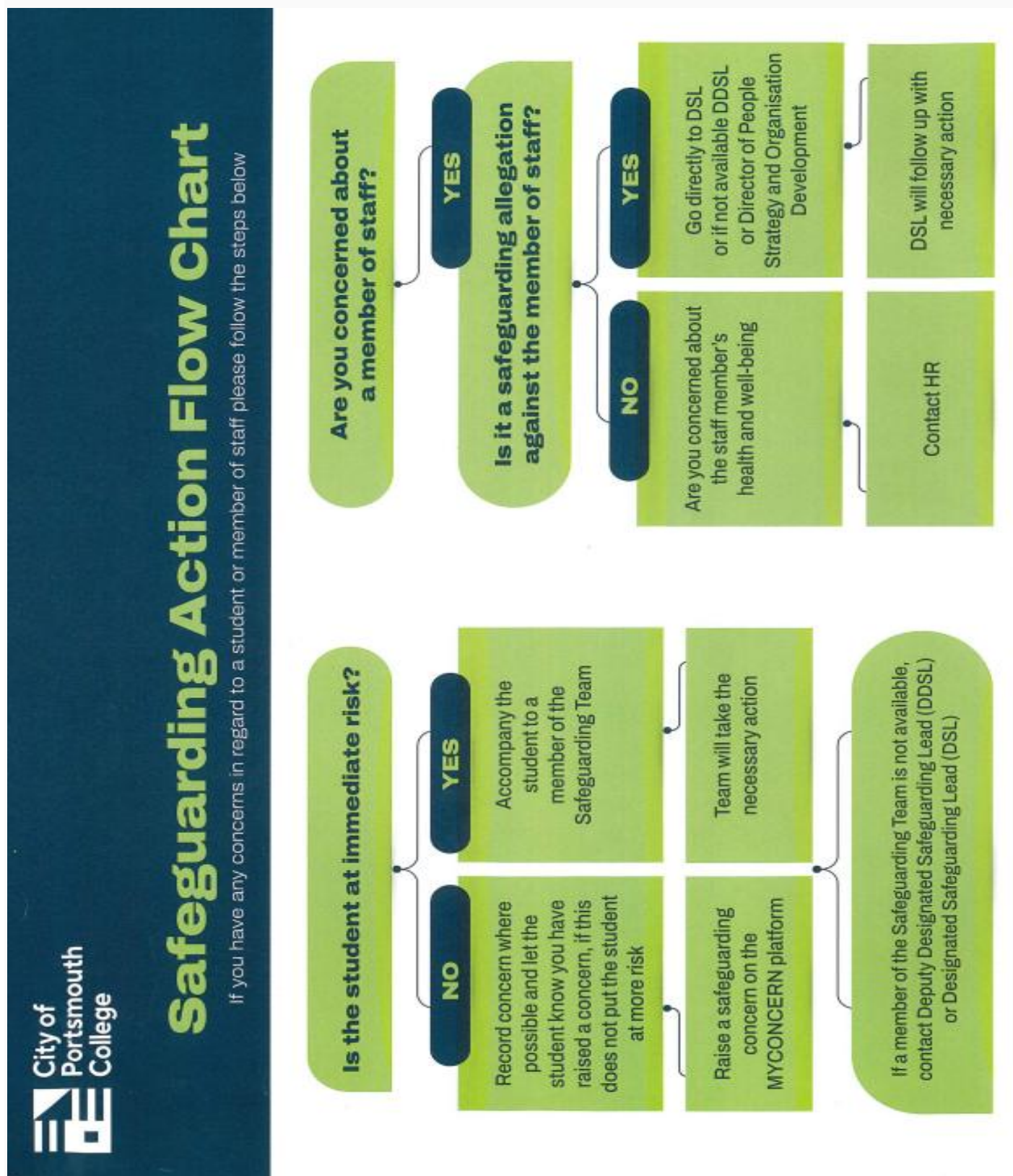
Concerns should be raised as soon as possible. You can report your concern in the following ways. Internally to:

- Jo Shankland, Designated Safeguarding Lead (DSL) – [joanne.shankland@copc.ac.uk](mailto:joanne.shankland@copc.ac.uk)
- Mickiela Blake, Deputy DSL – [mickiela.blake@copc.ac.uk](mailto:mickiela.blake@copc.ac.uk)

If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

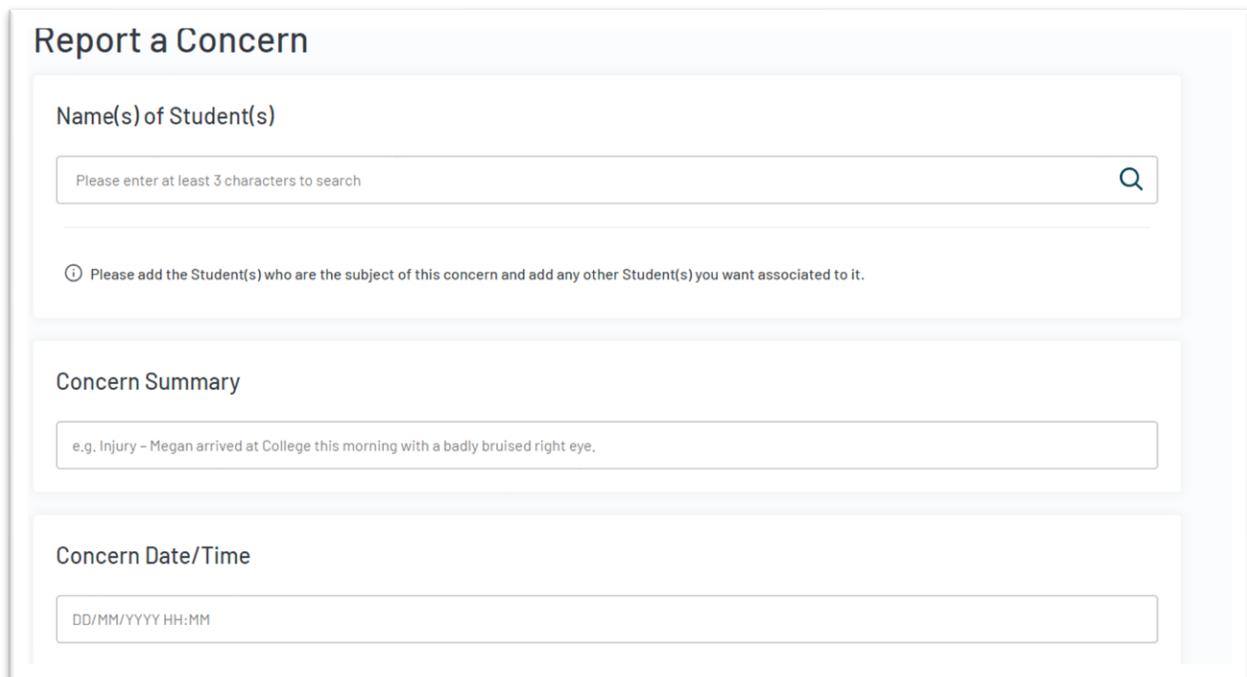
Anonymous concerns will be considered, although it may be more difficult to investigate and provide feedback. Staff are encouraged to provide their name and contact details to support a thorough and fair investigation.

## Appendix A – Safeguarding Flow Chart




## Appendix B: Reporting on MyConcern

1) To report a concern you will need to access MyConcern through The Staff Hub. You will need to click on the red 'Report' button. The next screen will allow you to start documenting your concern.



**Report a Concern**

**Name(s) of Student(s)**

Please enter at least 3 characters to search 

① Please add the Student(s) who are the subject of this concern and add any other Student(s) you want associated to it.

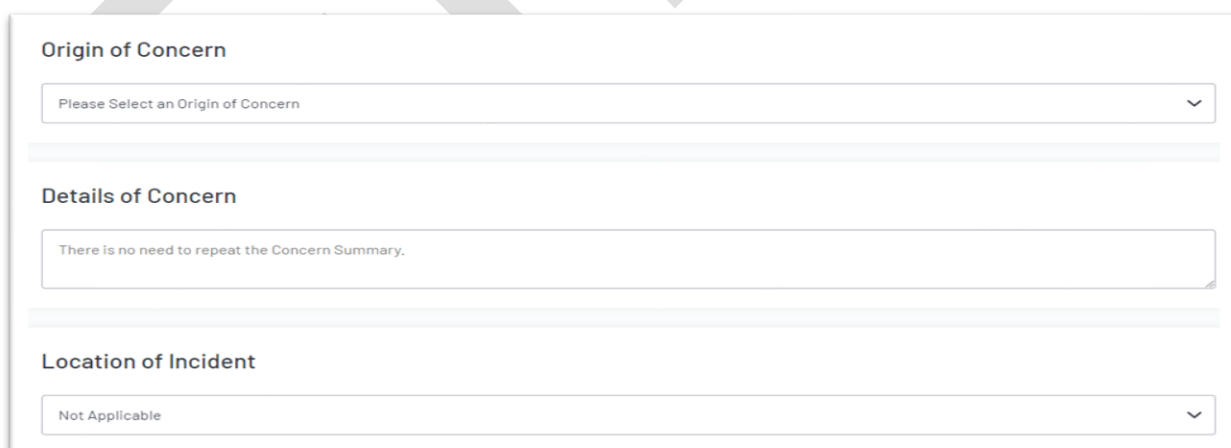
**Concern Summary**

e.g. Injury - Megan arrived at College this morning with a badly bruised right eye.


**Concern Date/Time**

DD/MM/YYYY HH:MM

2) The next screen will ask you to detail your concern, the information you provide will further support the Safeguarding team and the next steps they may take. You will continue through the screens until you reach 'Submit.'



**Origin of Concern**

Please Select an Origin of Concern 

**Details of Concern**

There is no need to repeat the Concern Summary.

**Location of Incident**

Not Applicable 