

SAFEGUARDING CHILDREN & VULNERABLE ADULTS POLICY AND PROCEDURE 2026/27

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Safeguarding Children and Vulnerable Adults Policy 2026/27

1. Introduction

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 must not hinder the sharing of information for safety purposes and the sharing of information must 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 2026), 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 feel 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, 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.
- Take the necessary steps to prevent unsuitable individuals from working with our students and vulnerable adults.
- Ensure 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 procedures for reporting such concerns.
- Establishing procedures for reporting and handling allegations of abuse concerning staff members.
- The safe recruitment of all staff, governors and volunteers.

3. Scope

This policy applies to all students (children, 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 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 must 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
- Attendance Policy
- 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 2026 part 1. This is statutory guidance from the Department for Education. Keeping children safe in education 2026 (publishing.service.gov.uk).

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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 & 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.

Legislation:

- Children Act 1989 (Updated 2004)
- Children and Families Act 2014
- Children and Social Work Act 2017
- Children and Young Persons Act 2008
- Education and Training Act 2021
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Serious Crime Act 2015 (including FGM mandatory reporting duty)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Data (Use and Access) Act 2025

- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026

Guidance:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Prevent Duty Guidance (latest version)
- Guidance for safer working practice for those working with children and young people in education settings (latest version)
- "What to do if you are worried a child is being abused" (latest version)
- SEND Code of Practice: 0 to 25 years
- HIPS (Hampshire, Isle of Wight, Portsmouth, and Southampton) Safeguarding Children Procedures (latest version)
- Hampshire, IOW, Portsmouth, and Southampton 4LSAB Multi-Agency Safeguarding Adults Policy and Guidance (latest version)
- Supporting Students with Medical Conditions
- Meeting Digital and Technology Standards in Schools and Colleges (2023, updated 2025)

The Children's Act 2004 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 2026 and Working Together to Safeguard Children 2026 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 occur 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 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' 2026 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

Data protection laws, including the Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025, regulate how personal information is handled and protected. Staff must ensure that information sharing decisions support safeguarding and child protection responsibilities. Where there is uncertainty, advice should be sought from the Safeguarding Team.

5.4. HIPS Procedure

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:

5.5. [Hipsprocedure.org.uk](https://hipsprocedure.org.uk)

5.6. [Hampshiresab.org.uk](https://hampshiresab.org.uk)

5.7. 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.

5.8. 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.

5.9. 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.

5.10. Safeguarding

This is defined in the Children Act 2004 as:

- 5.11. Protecting from maltreatment
- 5.12. Preventing impairment of mental and physical health and development
- 5.13. Ensuring that children grow up with the provision of safe & effective care
- 5.14. Taking action to enable all children to have the best outcomes

5.15. Safeguarding Team

The team comprises of

- 5.16. Designated Safeguarding Lead (DSL) / Vice Principal Student Experience
- 5.17. Senior Deputy Designated Safeguarding Lead
- 5.18. Deputy Designated Safeguarding Lead
- 5.19. 4 x Senior Safeguarding Officer; one per campus
- 5.20. 3 x Safeguarding Assistants
- 5.21. 1 x Designated Teacher for unaccompanied minors
- 5.22. 1 x Pre 15 Coordinator
- 5.23. All safeguarding staff trained to DSL

5.24. 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 & Inclusive Practice

6.1. Safeguarding Principles

Safeguarding is everyone's responsibility. The College recognises that children missing education, persistent absence, unexplained absence and disengagement from learning may be indicators of abuse, neglect, exploitation or increased vulnerability. Staff must monitor attendance and engagement, report concerns in line with college procedures, and escalate concerns where safeguarding risks are identified.

More than one emergency contact number will be kept by the College for all students wherever reasonably possible and will work collaboratively with families and relevant partner agencies to ensure timely and appropriate support is provided. Referrals and interventions will be implemented in accordance with safeguarding procedures where identified risks meet established safeguarding thresholds.

The College adopts a continuum of need approach and understands that children, young people and vulnerable adults may require different levels of support depending on their circumstances. Staff must be able to identify and respond appropriately to needs ranging from universal support, community-based early help and targeted Family Help through to safeguarding and child protection concerns. Staff are expected to understand local safeguarding thresholds, seek advice from the Safeguarding Team where concerns escalate, and ensure that appropriate support, intervention and referrals are made at the earliest opportunity.

The City of Portsmouth College places the voice of the child at the centre of safeguarding practice. The College will ensure that students feel heard, valued and listened to, and that their views, wishes and feelings are considered when determining safeguarding actions and outcomes. This will be achieved through safeguarding casework, tutorial activities, and student feedback mechanisms, ensuring students understand how their information will be used and feel confident to raise concerns.

All staff are expected to demonstrate professional curiosity within safeguarding practice, including the capacity to explore and understand what is happening with a child/young person/vulnerable adult beyond presenting concerns. Professional curiosity supports the effective identification of safeguarding concerns and ensures appropriate action is taken.

Student may be exposed to safeguarding risks that occur outside of the home and may be influenced by a range of environmental factors. Safeguarding practice will therefore take into account:

- 6.2. Peer relationships
- 6.3. Local community risks
- 6.4. Travel to and from college

6.5. Online environments and social media

Staff must consider these contextual factors when assessing concerns, making referrals, and planning support, working in partnership with external agencies where appropriate. Some students may experience varying levels of vulnerability, with some facing an increased risk of harm, particularly those with special educational needs and disabilities (SEND), Children We Care For (LAC), Care Leavers, Young Carers, Children with Social Care, students experiencing mental health difficulties, Unaccompanied Asylum-Seeking Children, LGBTQ+ and gender questioning students and any student experience multiple vulnerabilities. The College will ensure that safeguarding practice reflects these additional needs and that appropriate support is provided.

6.6. Mental Health & Trauma Information Practice

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:

- 6.7. Creating safe, supportive, and predictable environments.
- 6.8. Recognising signs of trauma and responding with empathy and understanding.
- 6.9. Avoiding practices that may re-traumatise individuals.
- 6.10. Promoting resilience through positive relationships and inclusive practices.
- 6.11. Integration of Mental Health & Safeguarding. The college is committed to ensuring that:
- 6.12. Safeguarding concerns that involve mental health are addressed holistically, with appropriate referrals to internal and external mental health services.
- 6.13. 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. Significant medical, health or clinical incidents may indicate wider safeguarding vulnerabilities and will be considered within safeguarding assessments, particularly where there are concerns relating to neglect, exploitation, mental health, self-harm, contextual safeguarding risks or unmet support needs.

6.14. Inclusion

The College's safeguarding approach recognises that effective safeguarding must be inclusive and responsive to the diverse identities and lived experiences of its students, apprentices, and vulnerable adults. It adopts an intersectional approach, recognising that individuals may experience multiple and overlapping forms of discrimination, exclusion, or disadvantage that can increase their vulnerability to harm. The College is committed to ensuring that safeguarding support is inclusive of LGBTQ+ and gender-questioning students and will continue to adapt its practice in line with current and emerging Department for Education guidance.

The College is committed to supporting students who are experiencing gender-related distress and may require support, understanding and appropriate safeguarding measures.

The College will:

- 6.15. Place the best interests of the student at the centre of all decision-making.
- 6.16. Consider each case individually, taking account of safeguarding, welfare, educational, medical, family, and wider contextual circumstances.
- 6.17. Involve parents and carers in decision-making wherever appropriate and safe to do so.
- 6.18. Avoid initiating or encouraging social transition within the educational environment.
- 6.19. Maintain clear records of decisions, support plans, and safeguarding considerations, and regularly review arrangements to ensure they remain appropriate and in the student's best interests.
- 6.20. Maintain accurate administrative records, including legal name, biological sex where required for safeguarding, regulatory or statutory purposes, and any agreed support arrangements
- 6.21. Promote a culture of inclusion, respect, and equity across all campuses.
- 6.22. Ensure safeguarding staff are trained to recognise and respond to intersectional vulnerabilities and emerging safeguarding needs.
- 6.23. Work collaboratively with specialist services, external agencies, and community organisations to provide appropriate support.
- 6.24. Ensure safeguarding procedures and support are accessible, inclusive, and culturally competent, including the use of interpreters and alternative communication methods where required.

The College recognises that gender-questioning children may be vulnerable to bullying, discrimination, mental health difficulties and online harms and will ensure appropriate safeguarding support is available.

6.25. Preventative Education

The College promotes a culture of respect and zero tolerance towards sexism, misogyny, misandry, homophobia, biphobia, racism, discriminatory language, harassment, harmful sexual behaviour, prejudice and all forms of violence. Preventative education is delivered through tutorials, enrichment, curriculum activity and targeted interventions where appropriate.

6.26. Online Safety and Emerging Technologies

The College is committed to ensuring that students are safe, supported and able to engage positively with digital technologies. As safeguarding risks increasingly occur online, the College recognises the growing complexity and significance of online safety, alongside the safeguarding, wellbeing and behavioural risks associated with unrestricted mobile phone use. The College will implement proportionate expectations and controls to promote student safety, support positive behaviour and minimise online harm. These risks include exposure to harmful content, disinformation, misinformation, and conspiracy theories, which may adversely affect wellbeing, influence decision-making, and increase vulnerability to harm.

Risks include:

- 6.27. Cyberbullying and harassment
- 6.28. Online grooming and exploitation
- 6.29. Disinformation and misinformation
- 6.30. AI-generated risks such as deepfakes and impersonation
- 6.31. Self-generated or AI-generated sexual imagery (including deepfakes)
- 6.32. Financially Motivated Sexual Extortion (FMSE), including threats to share intimate images or videos in exchange for money, goods, services or further images.

The College will:

- 6.33. Educate students and staff to recognise and respond to online risks
- 6.34. Ensure filtering and monitoring systems are effective and regularly reviewed
- 6.35. Promote safe and ethical use of digital technologies, including AI
- 6.36. Provide clear reporting mechanisms for online abuse through MyConcern

The Designated Safeguarding Lead (DSL) has a strategic oversight of online safety, including the College's filtering and monitoring arrangements. Working in partnership with the Director of IT, Network Manager, Senior Leadership Team and Governors, the DSL will ensure that these systems remain effective, proportionate, regularly reviewed and clearly understood by relevant staff.

Filtering and monitoring arrangements will be reviewed formally at least annually, with detailed records of reviews, testing activities and any resulting actions maintained as part of the College's safeguarding governance and assurance processes.

6.37. Filtering and Monitoring Governance

The Governing Body will receive regular assurance regarding the effectiveness of filtering and monitoring systems. This will include oversight of safeguarding incidents relating to technology, emerging risks, and system effectiveness. Reviews will consider filtering effectiveness, monitoring arrangements, device usage data, location-based access where available, safeguarding alerts, emerging technological risks and any identified vulnerabilities within college systems. Governors will ensure that systems are appropriate, proportionate, and understood in terms of their capabilities and limitations.

6.38. Emerging Safeguarding Risks

Safeguarding risks continue to evolve and therefore require ongoing awareness, vigilance, and regular review to ensure effective protection and support for students.

Emerging risk include:

- 6.39. Financial exploitation and online fraud
- 6.40. Misuse of artificial intelligence by students
- 6.41. New and evolving forms of extremism
- 6.42. Digital coercion, manipulation, and online harm
- 6.43. Modern slavery and human trafficking

The College will ensure that staff receive appropriate training and updates in response to emerging safeguarding issues.

6.44. Child on Child Abuse

The City of Portsmouth College recognises that children and young people may abuse other children. This is referred to as child-on-child or peer-on-peer abuse. The College adopts a zero-tolerance approach to such behaviours.

Child-on-child abuse can include:

- 6.45. Sexual violence and sexual harassment
- 6.46. Bullying, including cyberbullying
- 6.47. Physical abuse.
- 6.48. Abuse within intimate relationships.
- 6.49. Harmful sexual behaviour.
- 6.50. Exploitation, including criminal and sexual exploitation.
- 6.51. Misogynistic attitudes and behaviours, which may intersect with harmful sexual behaviour and abuse.

- 6.52. Physical assault, threats with weapons, and serious violence, recognising that both the victim and the alleged perpetrator may require safeguarding support.
- 6.53. Image-based abuse: non-consensual sharing of images or videos; AI-generated intimate images; Deepfake imagery and manipulated content and initiation or hazing-type violence and abuse.

All staff must take all reports seriously, ensure that victims are supported, and avoid victim-blaming.

The college will respond by:

- 6.54. Conducting appropriate risk assessments
- 6.55. Ensuring that victims are kept safe
- 6.56. Managing ongoing risk within the College environment
- 6.57. Providing support to both victims and alleged perpetrators where appropriate
- 6.58. All incidents will be recorded and managed in line with safeguarding procedures.

6.59. Safeguarding and Use of Facilities

The College understands the importance of maintaining privacy, dignity and safety for all students when using toilets, changing facilities, residential accommodation, and other College spaces.

The College will maintain separate toilet facilities, changing and showering facilities where applicable, and ensure that residential accommodation, overnight visits and educational visits reflect safeguarding requirements relating to single-sex sleeping arrangements. All arrangements will be implemented in accordance with current statutory guidance and with due regard to the safety, dignity and wellbeing of all students and any potential safeguarding risks.

Where individual needs are identified, alternative arrangements may be considered where appropriate, provided they do not compromise the safety, dignity or privacy of others. Any such arrangements will be subject to an appropriate risk assessment, recorded and reviewed regularly to ensure they remain safe, inclusive and effective.

7. Roles & 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

- 7.4. 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.
- 7.5. 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.
- 7.6. 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).

7.7. All Staff

All staff have a responsibility to:

- 7.8. Be familiar with Part 1 of Keep Children Safe in Education (KCSiE 2026) for staff working.
- 7.9. 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.
- 7.10. Are responsible for providing a safe environment in which students can learn and must be prepared to identify students who may benefit from early help.
- 7.11. Establish and maintain an environment where young people feel secure, are encouraged to talk, and are listened to and not judged.
- 7.12. Ensure they know who the Safeguarding Team are and know how to contact them.
- 7.13. Be familiar with how to make a safeguarding referral, and any staff member who has a concern about a child's welfare must follow the College's referral processes (MyConcern).
- 7.14. Maintain an attitude of "it could happen here" with regards to safeguarding.
- 7.15. Demonstrate professional curiosity in safeguarding practice
- 7.16. Recognise and respond appropriately to child-on-child abuse.
- 7.17. Report immediately any disclosure, statement, online activity, possession of information, or behaviour indicating an intention to carry, possess or use a weapon. Such concerns must be treated as a safeguarding matter, recorded on MyConcern and referred without delay to the Safeguarding Team
- 7.18. Maintain appropriate professional boundaries at all times, including in relation to digital communication and one-to-one interactions
- 7.19. Understand the College's thresholds for Family Help, safeguarding, and child protection.
- 7.20. Know what to do if a child tells them he/she is being abused, neglected or exploited.
- 7.21. Recognise the signs of female genital mutilation (FGM) and be aware of their specific legal duty in report such concerns to the police.
- 7.22. Record all discussions and decisions made, and reason for those decisions via MyConcern.
- 7.23. Refer any concerns, including low-level concerns, 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. A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the staff code of conduct.

The College promotes a culture of openness and transparency where all concerns are shared without delay. Where concerns escalate, staff must seek advice from the Safeguarding Team and follow internal and external referral processes, including referral to appropriate agencies.

7.24. Employers/Work Experience:

- 7.25. All employers who will be supporting a young person, apprentice or a vulnerable adults have a responsibility to:
- 7.26. Adhere to the College's work placement process, including Health and Safety and Insurance checks.
- 7.27. Be aware of safeguarding processes and what to do if they have any concerns prior to any placement starting.
- 7.28. Adhere to any support plans in place to ensure the safety of the young person, apprentice, or adult student.

7.29. Contractors/Consultants/Volunteers and others Working at the College Campus

- 7.30. 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.
- 7.31. 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.
- 7.32. Where appropriate risk assessments for non-facing roles may be used, but only if approved by the DSL.

7.33. Safeguarding Team

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

Managing Referrals:

- 7.34. Support staff to report concerns via the College reporting mechanism, MyConcern.
- 7.35. To ensure that there is effective front-line safeguarding support for students and staff.
- 7.36. Respond appropriately to disclosures or other concerns which relate to the wellbeing and welfare of students in accordance with college policy and procedures.
- 7.37. Support DDSLs and DSL to promote positive safeguarding procedures and practices within the College.
- 7.38. Refer cases of suspected abuse to the local authority children's social care as required.
- 7.39. Refer cases to the Channel programme, in consultation with the DSL, where there is a radicalisation concern as required.
- 7.40. Refer cases where a crime may have been committed to the Police as required.
- 7.41. 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

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

- 7.45. The College will challenge and escalate concerns where partner agencies do not take appropriate action to safeguard a child.
- 7.46. Liaise with the PCC (Portsmouth City Council) Link Coordinator to further support identified vulnerable students.
- 7.47. Liaise with external agencies on matters of safety and safeguarding.
- 7.48. Where there are concerns about the response of partner agencies, the College will challenge and escalate concerns appropriately to ensure that children and young people are safeguarded effectively.

Training

- 7.49. The Safeguarding Team will undergo training to provide them with the knowledge and skills required to carry out the role. This training must be updated at least every two years.
- 7.50. The Safeguarding Team must undertake Prevent Awareness training on an annual basis.
- 7.51. In addition to the formal training set out above, their knowledge and skills must 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.
- 7.52. Be alert to the specific needs of young people in need, those with special educational needs and young carers.
- 7.53. Keep detailed, accurate, secure written records of concerns, including a 'MyConcern added' note on EBS.
- 7.54. Understand and support the COPC with regard to the requirements of the Prevent Duty.

Recording & Monitoring

- 7.55. Safeguarding records must include a clear and comprehensive summary of the concern, detailed chronology of events, actions taken and outcomes, rationale for all decisions and identification of patterns or cumulative risk over time.
- 7.56. Records must be accurate, timely, and securely stored in line with data protection requirements.
- 7.57. Professional judgement and rationale for decisions must be recorded to support effective safeguarding practices.
- 7.58. Keep up to date written records of Safeguarding concerns using MyConcern.
- 7.59. Safeguarding files will be transferred securely to the receiving setting as soon as possible, and in any event within **5 working days for in-year transfers**, with confirmation of receipt obtained.
- 7.60. Safeguarding records will be retained until a student reaches their 25th birthday or transfers to another institution.

Availability

- 7.61. During term time the Safeguarding Team will be available, during college hours, for staff in the College to discuss any safeguarding concerns.
- 7.62. There will be a Safeguarding Team rota during the holidays, to ensure there is coverage must the need arises.
- 7.63. If a staff member has a safeguarding concern whilst teaching in the evening (17:00–21:00, Monday to Thursday), staff must follow the College's Serious Incident Management Procedure. Where there is an immediate risk of harm, the Duty Manager will escalate the concern without delay by contacting the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).
- 7.64. 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.

The College maintains robust safeguarding cover arrangements to ensure safeguarding concerns are managed without delay during periods of absence, annual leave, training or unforeseen unavailability of the Designated Safeguarding Lead (DSL). Deputy Designated Safeguarding Leads are trained to the same safeguarding standard as the DSL and are authorised to undertake safeguarding duties on behalf of the DSL where required. Safeguarding concerns must never be delayed due to the absence of an individual safeguarding lead.

7.65. Deputy Designated Safeguarding Lead

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

7.71. 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 2026 is in Annex C.

In summary the Designated Lead Safeguarding Officer will:

- 7.72. Coordinate safeguarding practices across the College
- 7.73. Liaise with the Director of People & Organisational Development to deal with allegations against members of staff, contractors, and volunteers
- 7.74. 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.
- 7.75. 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.
- 7.76. 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.
- 7.77. 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.
- 7.78. Act as a point of contact and work with local Safeguarding partners
- 7.79. Liaise with the Deputy CEO to inform them of ongoing enquiries and police investigations. This must include being aware of the requirement for the child to have an appropriate adult.
- 7.80. 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.

- 7.81. 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.
- 7.82. 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.
- 7.83. Raise awareness about safeguarding and child protection on an on-going basis
- 7.84. Arrange updates on safeguarding training for staff on an annual basis and induction training on child protection for new staff
- 7.85. Ensure that the Designated Safeguarding Lead, the Deputy Designated Officers, and the Safeguarding Officers receive updated training on a regular basis, at least annually.
- 7.86. Ensure that safeguarding records are kept up to date and report to SMT and Governors.

Director of People and Organisational Development

The Director of People and Organisational Development will:

- 7.87. 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.
- 7.88. 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.

7.89. Principal/CEO

The Principal/CEO will:

- 7.90. 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.
- 7.91. Delegate operational responsibility and implementation of procedures to a SMT member.
- 7.92. Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.
- 7.93. Designated Governor

The Designated Governor will

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

7.97. The Governing Body

The Governing Body will ensure that:

- 7.98. They are familiar with Parts 1 and 2 of Keeping Children Safe in Education (2026).

- 7.99. The City of Portsmouth College has effective Safeguarding and Child Protection Policies and Procedures, and these are updated annually and available publicly.
- 7.100. Portsmouth Safeguarding Children Partnership (PSCP) and Portsmouth Adult Safeguarding Board are informed annually about the discharge of duties via the safeguarding audit.
- 7.101. Recruitment, selection, and induction follow safer recruitment practice.
- 7.102. 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.
- 7.103. Staff have been trained appropriately, and this is updated in line with guidance.
- 7.104. Any safeguarding deficiencies or weaknesses are remedied without delay.
- 7.105. 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. However, this does not diminish the obligation of college 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 to ensure a collaborative and transparent approach.

Whilst the referring school retains overall responsibility, the College recognises that it has a direct safeguarding responsibility for students whilst they are on site or participating in college-led activities. The College will ensure that safeguarding arrangements are effectively implemented and that all concerns are responded to in line with college procedures.

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

- All staff working with the 14 -16 provision have undergone the required safeguarding checks, and written confirmation of these checks is provided to schools in the form of a 'letter of confirmation' from the College DSL.
- 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.

The College will ensure effective and timely information sharing with referring schools and local authorities. This includes:

- Sharing relevant safeguarding information prior to the start of placement
- Providing updates on attendance, behaviour, and wellbeing where appropriate
- Escalating safeguarding concerns without delay

The College will maintain appropriate oversight of all 14–16 students, including monitoring attendance, engagement, and wellbeing, and acting promptly where concerns arise. All 14–16 students will receive information on safeguarding arrangements as part of their induction, including how to report concerns, who the safeguarding team are, and how to access support. Where appropriate, risk assessments will be completed and reviewed to ensure that individual needs, vulnerabilities, and safeguarding risks are identified and managed effectively.

The Vice Principal for Student Experience supported by the Assistant Principal for Student Experience (NH and HC) & SDDSL will have clear accountability for the oversight of 14–16 provision, including regular review by senior leaders to ensure safeguarding arrangements remain effective. More than one emergency contact number for each child wherever reasonably possible, to support safeguarding and welfare responses.

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 COPC all staff, paid or voluntary are recruited and selected in line with the government guidance in 'Keeping Children Safe in Education' (2026).

9.2. Pre-employment Checks include:

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

9.10. Single Central Record (SCR)

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

- 9.11. Staff (including agency and supply staff)
- 9.12. Governors
- 9.13. Volunteers
- 9.14. 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.

9.15. Safer Recruitment Training

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

9.18. Allegations against staff

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

9.21. Enhanced Safeguarding Recruitment

The college will further strengthen safer recruitment practices by

- 9.22. Undertaking online checks for shortlisted candidates
- 9.23. Exploring gaps in employment history
- 9.24. Including safeguarding focused questions within the recruitment process

10. Whistleblowing

As stated in KCSIE 2026, 'all staff and volunteers must 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 must 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 must 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

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

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

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.

Appendix A: Examples of Abuse (KCSiE 2026)

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

The College recognises that victims of exploitation may be criminalised for actions they are coerced or manipulated into undertaking and will ensure they are treated as victims first and foremost. 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:

- Associate with other children involved in exploitation
- Appear with unexplained gifts, money, or new possessions
- 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.

Modern Slavery & Human Trafficking:

Modern slavery is a form of exploitation. Victims may be controlled through threats, violence, debt or coercion.

Indicators may include:

- Unexplained absence
- Signs of physical abuse
- Fear of authority figures
- Restricted freedom of movement
- Exploitation through work or criminal activity

The College will work with safeguarding partners, police and local authorities where there are concerns regarding trafficking or modern slavery.

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 must be followed and both young victims and young perpetrators must be offered support.

Operation Encompass

The College supports the principles of Operation Encompass. Where appropriate notifications are received from the police regarding domestic abuse incidents affecting a student, the College will:

- Consider immediate safeguarding needs.
- Provide pastoral and emotional support.
- Monitor attendance, behaviour and wellbeing
- Work collaboratively with relevant agencies

Operation Encompass notifications do not replace safeguarding referrals and will be managed in accordance with college safeguarding procedures.

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) must be aware of local procedures for making a Prevent referral.

Sexual violence & 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 must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor must 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.

Honour or Faith-Based Abuse (HFBA) (including Female Genital Mutilation, Forced Marriage and Breast Ironing): Honour or Faith-Based Abuse (HFBA) encompasses incidents or crimes committed to protect or defend the honour, beliefs or perceived reputation of an individual, family, community or faith group. 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 Honour or Faith Based Abuse (HFBA) are abuse (regardless of the motivation) and must 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 2026

City of Portsmouth College – Safeguarding Policy Addendum 2026
Summary of Required Updates from KCSIE 2026

Gender-Questioning Students

The policy has been updated to reflect KCSIE 2026 and guidance informed by the Cass Review. This includes the requirement to place the child's best interests at the centre of decision-making, involve parents and carers wherever appropriate and safe to do so, avoid initiating or encouraging social transition within the educational environment, and ensure decisions are based on individual safeguarding, welfare, educational, medical and family circumstances. Additional recognition has been given to the vulnerabilities that gender-questioning children may experience, including bullying, discrimination, mental health difficulties, and online harms.

Single Sex Facilities

The policy now includes enhanced safeguards relating to the use of toilets, changing facilities, residential accommodation, and educational visits. Updated wording emphasises privacy, dignity, safety and compliance with statutory guidance, whilst ensuring that any individual arrangements are risk assessed, recorded and regularly reviewed.

Mobile Phone Expectations

Additional consideration has been given to the safeguarding, behavioural and wellbeing risks associated with unrestricted mobile phone use. The policy reflects the expectation that educational settings should take proportionate steps to minimise online abuse, cyberbullying, harmful online influences, and the inappropriate sharing of images and videos.

Online Safety, Artificial Intelligence and Deepfakes

Online safety sections have been updated to include emerging risks associated with artificial intelligence, AI-generated content, deep-fake technology, misinformation, disinformation, online exploitation, financial scams, and digital manipulation. The policy also recognises that AI-generated intimate images and manipulated content may constitute child-on-child abuse and safeguarding concerns.

Filtering and Monitoring

The policy now strengthens governance arrangements relating to filtering and monitoring systems. Responsibilities of safeguarding, IT and leadership teams are clearly defined, with annual review requirements, monitoring oversight and escalation procedures for safeguarding concerns identified through these systems.

Staff Safeguarding Responsibilities

The requirement for all staff to read and understand Part One of Keeping Children Safe in Education 2026 has been reinforced. This applies to all staff regardless of their role or level of contact with students and is supported through induction, training and regular safeguarding updates

Child-on-Child Abuse

The policy has broadened the definition of child-on-child abuse to include misogynistic behaviour, serious violence, threats involving weapons, image-based abuse, non-consensual image sharing, AI-generated intimate imagery and deepfake content. The policy continues to adopt a zero-tolerance approach and emphasises that all reports will be taken seriously and appropriately investigated.

Operation Encompass

The policy now includes reference to Operation Encompass and recognises the importance of responding appropriately to police notifications relating to domestic abuse incidents affecting students. The impact of domestic abuse on children's welfare, educational engagement and emotional wellbeing is recognised throughout safeguarding practice.

Mental Health and Safeguarding

The mental health section has been strengthened to highlight early identification of concerns such as self-harm, suicidal ideation, emotional distress, significant behavioural changes, withdrawal, eating difficulties, and disengagement from education. Mental health continues to be considered within the wider safeguarding context and alongside experiences of abuse, neglect, exploitation, and trauma.

Trainee Teachers and Student Placements

The policy now clarifies that trainee teachers and teaching placement students are regarded as members of staff for safeguarding purposes. They are therefore subject to the same safeguarding expectations, induction requirements, training, professional standards and reporting responsibilities as permanent, temporary, agency and contract staff.

Working Together to Safeguard Children 2026

Additional updates have been incorporated to reflect Working Together to Safeguard Children 2026, including the continuum of need, Family Help arrangements, contextual safeguarding, professional curiosity, improved information sharing, anti-discriminatory practice, the voice of the child, children missing education, attendance as a safeguarding issue, online harm, and strengthened multi-agency working arrangements.

Modern Slavery, Trafficking and Exploitation

The policy further strengthens awareness of modern slavery, human trafficking, child criminal exploitation and child sexual exploitation. It recognises that children who are exploited are victims first and may require safeguarding intervention regardless of any criminal activity they have been compelled to undertake. The policy also acknowledges support available through the National Referral Mechanism (NRM) and Independent Child Trafficking Guardian (ICTG) service.

Safeguarding Children and Vulnerable Adults Procedure 2026/27

1. Introduction

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 must 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 must 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 must 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 Safeguarding Team who will liaise with the relevant agencies. Staff will not get involved in this as they may not have all the relevant information.

2.1 Managing 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 must 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 must be transferred separately from any other information, ensuring secure transit and confirmation of receipt must 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.

3. Availability and Out of Hours Procedure

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 must 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 must 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, whether paid or voluntary, are recruited and selected in line with government guidance in 'Keeping Children Safe in Education' (2026).

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
- Recommendations for improvement

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 or

Mickiela Blake, 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 Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSL) or the Safeguarding Team.

7. Whistleblowing Procedure

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

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

- Jo Shankland, Designated Safeguarding Lead (DSL) and Vice Principal Student Experience – joanne.shankland@copc.ac.uk
- Mickiela Blake, Deputy DSL – mickiela.blake@copc.ac.uk

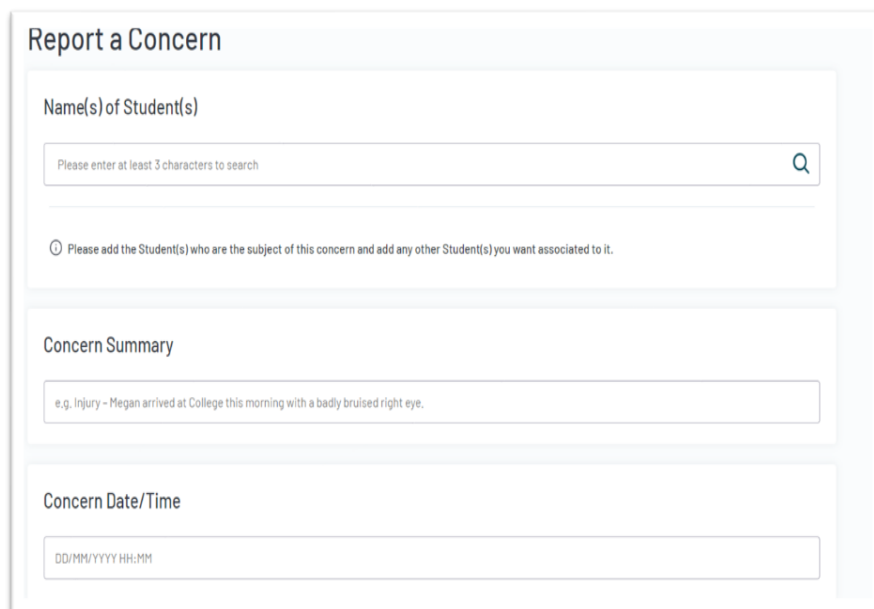
If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy must be consulted. Anonymous concerns will be considered, although it may be more difficult to investigate and provide feedback. Staff are encouraged to provide their name and contact details to support a thorough and fair investigation.

Appendix A: Safeguarding Flow Chart



Appendix B: Reporting on MyConcern

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

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

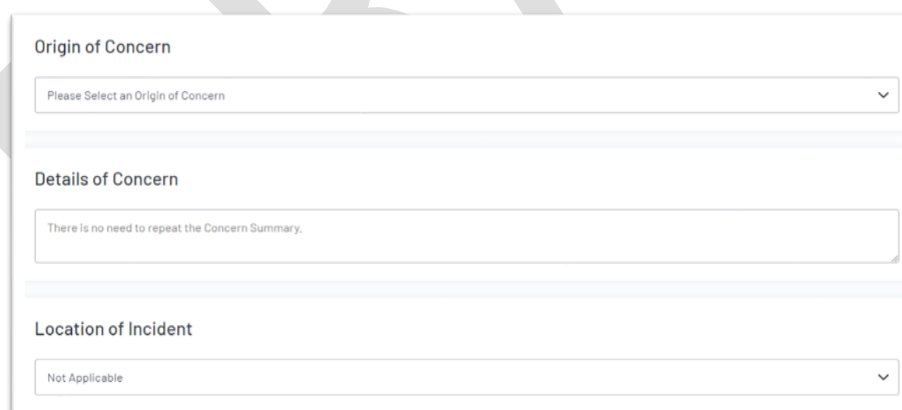
Concern Summary

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

Concern Date/Time

DD/MM/YYYY HH:MM

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