

Child Protection and Vulnerable Adults, including those with care and support needs

Including the Prevent Duty

2025/26 Academic Year

SLT Owner	Emma Brannen
Department Area	Safeguarding
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1. Designated Staff Responsible for Safeguarding

Nominated Governor for Safeguarding John Tew

Senior Management Team Member with

Leadership Responsibility for Safeguarding: Emma Brannen

Dedicated full time Safeguarding Staff:

Designated Safeguarding Lead (DSL),

Sandwell Family of Colleges: Paul Smith

Deputy Safeguarding Lead (Central/CSM): Kirsty Wealthall Deputy Safeguarding Lead (Cadbury): James Blunt

Safeguarding Officer (Central/CSM):

Safeguarding Officer SEN (Central):

Marius Hodorog

Safeguarding Officer (Cadbury): Lyn James

Safeguarding Officer (Cadbury): Madison Shanahan-Gorajczyk

Refer to **Annex 1** for locations and contact details Refer to **Annex 2** for key external contacts

2. Introduction

- 2.1 Safeguarding is everyone's responsibility. Everyone who comes into contact with children and families has a role to play. The Sandwell Colleges is committed to safeguarding and promoting the wellbeing of all its students.
- 2.2 Our Colleges are a community and all those directly connected with it staff members, volunteers, contractors, employers, governors, parents, families, learners and apprentices; have an essential role to play in making it safe and secure.
- 2.3 The college recognises that it is the responsibility of **all** staff to ensure that all students are safe and feel safe in the college environment. Colleges are an important part of the wider safeguarding system for children.
- 2.4 The Board of Governors will ensure that the College has arrangements in place to safeguard and promote the welfare of learners and apprentices and will work together with other agencies to identify, assess and support those children and adults who are suffering or likely to suffer harm.

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- 2.5 This policy applies to all children (i.e. those who have not yet reached their 18th birthday) and Vulnerable Adults, including those with care and support needs who are learners at our College or who visit / come into contact with our communities.
- 2.6 This policy applies to all members of staff in our colleges, including all permanent, temporary and support staff, governors, volunteers, contractors, employers and external service or activity providers
- 2.7 The College recognises and embraces that it forms part of a wider safeguarding framework and system. This framework and system is outlined in fuller detail in the statutory guidance 'Working Together to Safeguard Children' (2023).
- 2.8 This policy encompasses all aspects of child protection and safeguarding including e-safety, bullying and harassment (in person or electronically) and due regard to the prevention of young people becoming extremist in their views and or actions, or being radicalised. This policy should be read in conjunction with the relevant statutory guidance 'Keeping Children Safe in Education' (2025).
- 2.9 The College recognises a number of associated policies, procedures and other documents relating to safeguarding. This policy should be read in conjunction with those as listed below:

Relevant Policies:

- Anti-Bullying and Harassment Policy
- Criminal Convictions Policy
- Fitness to Study Policy
- Fundamental British Values Policy
- Managing Events and Outside Speakers Policy
- Photography Policy
- Safeguarding Professional Boundaries Policy
- Self-Harm and Suicidal Behaviour Prevention Policy
- Students at Risk Policy
- Substance Misuse Policy
- Transgender Policy
- Visitor Policy

Relevant Procedures:

- Procedure for staff who perform a Safeguarding role
- Procedure for reporting and dealing with Allegations of Abuse against Members of Staff and Adults in a position of Trust.
- Death of Student in Learning Procedure.
- Guidance for taking Statements.
- Net Support DNA procedure.
- Escalating concerns about Persistent Absence to Safeguarding procedure.

Please note that all the above policies and procedures are accessible via the Library within CPOMS.

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3. Purpose of the Safeguarding Policy

- 3.1 To promote and prioritise the safety and welfare needs of all learners and apprentices.
- 3.2 To protect learners and apprentices from maltreatment and prevent the impairment of their health and development.
- 3.3 To ensure that learners and apprentices learn and grow in circumstances consistent with the provision of safe and effective care, enabling them to have the best outcomes in life.
- 3.4. To support learners and apprentice's development in ways that will foster security, confidence, resilience and independence.
- 3.5 To provide an environment in which learners and apprentices feel safe, secure, valued, respected, listened to and confident to approach trusted adults if they are in difficulties.
- 3.6 To raise the awareness of all teaching and non-teaching staff and volunteers of their responsibilities to safeguard children and to provide clear direction about expected codes of conduct in dealing with child protection and adult at risk issues.
- 3.7 To ensure that all members of the college community respond to cases of suspected abuse, neglect and exploitation consistently, sensitively, professionally and in ways which best support the needs of the learner or apprentice.
- 3.8 The Education Act 2002, Section 175 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) requires local education authorities and the governors of further education (FE) colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- 3.9 Safeguarding and promoting the welfare of children is defined (as per the statutory guidance, Keeping Children Safe in Education 2025) and for the purposes of this guidance as:
 - Providing help and support to meet the needs of children as soon as problems emerge;
 - Protecting children from maltreatment, whether that is within or outside the home, including online;
 - Preventing the impairment of children's mental and physical health or development;
 - Ensuring that children grow up in circumstances consistent with the provisions of safe and effective care:
 - Taking action to enable all children to have the best outcomes.

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4. Safeguarding Ethos and Culture

- 4.1 Whole-college approach: We will embed safeguarding across the College to ensure all areas prioritise the safety and welfare of learners.
- 4.2 Positive, secure environment: We will create a positive and secure environment where students feel valued, supported, and safe to disclose concerns.
- 4.3 Inclusive protection: We will protect all learners, including children, young people, and adults with care and support needs, regardless of age, disability, gender, racial heritage, religion, sexual orientation, or identity. We ensure all children and young people receive equal protection, while recognising that some face increased risks of abuse and barriers to recognising or disclosing it. Extra support, advice, and guidance, communicated in ways that meet their individual needs, are provided for groups such as those with SEN or disabilities, young carers, children in need, those facing discrimination, and those with English as an additional language.
- 4.4 Curriculum integration: We will include safeguarding topics in tutorials and relevant courses to raise awareness and understanding among learners.
- 4.5 Professional curiosity: We will ensure staff remain alert to signs of abuse, exploitation, or neglect, recognising that learners may not feel ready or able to disclose harm.
- 4.6 Safe working practices: We will require staff to adhere to codes of conduct and professional boundaries.
- 4.7 Shared responsibility: We will promote a culture of safety where all staff, governors, volunteers, learners, and visitors share responsibility for safeguarding.
- 4.8 Collaborative safeguarding: We will ensure protection through cooperation and collective responsibility among staff, agencies, and individuals.
- 4.9 Responsive support: We will support learners who are abused or at risk and take all disclosures seriously, reporting them swiftly and respecting privacy.
- 4.10 Clear procedures: We will provide clear safeguarding procedures for raising concerns, reporting incidents, and ensuring all College members understand their responsibilities.
- 4.11 Staff support: We will provide staff with access to Designated Safeguarding Members for advice, reassurance, and guidance following safeguarding or Prevent incidents.

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5. Statutory Framework

In order to safeguard and promote the welfare of children, the college will act in accordance with the following legislation and guidance:

- 5.1 The Education Act 2002, (section 175/157) requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- 5.2 Education and Training (Welfare of Children) Act 2021 amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 to impose safeguarding duties on 16 to 19 academies and further education in essence ensuring that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.
- 5.3 The Children Act 2004
- 5.4 Sandwell Children's Safeguarding Partnership Inter Agency Procedures West Midland regional **Procedures**
- 5.5 Working Together to Safeguard Children (2023) requires education institutions to follow the procedures for protecting children from abuse which are defined by Sandwell Multi Agency Safeguarding Arrangements and have appropriate procedures in place for responding to all concerns of actual or suspected abuse including allegations against members of staff in a position of trust.
- 5.6 **Keeping Children Safe in Education –** outlines the statutory duties on all schools and colleges.
- 5.7 Sexual Offences Act 2003:
- 5.8 Section 26 of the Counter-Terrorism and Security Act (2015)
- 5.9 The Prevent Duty The college is 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 being drawn into terrorism".
- 5.10 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 social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.
- 5.11 Forced Marriage (Civil Protection) Act 2007 (legislation.gov.uk) The legal age of marriage in England and Wales is 18 years old.

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6. Key Roles and Responsibilities

6.1 The Governing Body

- Have strategic leadership responsibility for the College's Safeguarding arrangements and must ensure they comply with their duties under KCSIE legislation.
- They are responsible in ensuring Safeguarding policies and procedures and training are effective and comply with law at all times.

6.2 Principal and CEO

Ensure that the policies and procedures adopted by the Board of Governors are fully implemented and are fully understood by all staff.

6.3 Senior Staff with Designated Lead Responsibility

- Ensure there is a designated member of the College Executive Team responsible for safeguarding.
- Ensure there is a designated safeguarding lead (DSL) who is a senior member of staff for safeguarding who has received appropriate training and support for this role.
- Ensure all members of staff understand their responsibilities in referring any concerns to Safeguarding as outlined in the Safeguarding Reporting flow chart (Annex 3).
- Ensure all relevant safeguarding procedures are kept up-to-date in line with legislation and local Children Trust recommendations.
- Develop effective links with relevant agencies and cooperate as required with requests.
- Provide regular reports on safeguarding to the Governing Body.

6.4 Human Resources

- Ensures that the College follows safer recruitment practices: verifying identity, qualifications, references, employment history, and health capacity.
- Ensure that all staff and volunteers must complete enhanced DBS checks to ensure suitability for working with children.
- Keep records of safeguarding training and ensure that the Single Central Record is maintained.
- Ensure that recruitment procedures are regularly reviewed to remain compliant with Keeping Children Safe in Education.

6.5 All staff members, Governors, volunteers and external providers

Understand their responsibility to safeguard and protect children and Adults at Risk, know how to recognise signs and symptoms of abuse, neglect and exploitation, how to respond to learners and apprentices who disclose, and what to do if they are concerned about a child and Adults at Risk.

6.6 All staff

Are aware that young people/vulnerable adults may not feel ready or know how to tell someone that they are being abused/neglected, exploited and/or may not recognise their experiences as being harmful. For example, they may feel humiliated, embarrassed or being threatened. This could be due to their vulnerability, disability and/ or sexual orientation or language barriers. This should not prevent professional curiosity and staff should speak to the Safeguarding team or use CPOMS if they have any concerns.

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6.7 Curriculum Teams

- Ensure that Safeguarding and Prevent are embedded across curriculum schemes of work and tutorial programmes.
- Ensure that key issues are reinforced through external speakers and productions.

6.8 Children Looked After (previously Looked After Children) Co-ordinator

- Promote the educational achievement and safety of looked after and previously looked after children.
- Provide staff with essential safeguarding information on legal status, care arrangements, and contact details.
- Lead effective multi-agency collaboration to address vulnerabilities and ensure prompt safeguarding action.

7. Supporting at-risk Children, Young People and Adults

7.1 We recognise that children, young people and vulnerable adults who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and have some sense of blame. Our College may be the only stable, secure and predictable element in their lives.

7.2 In these circumstances, a learner's behaviour may range from that which is perceived to be 'normal' to behaviour which may be aggressive or withdrawn.

7.3 Our College will support all learners and apprentices by:

- ensuring the content of the curriculum includes social and emotional aspects of learning;
- ensuring a comprehensive curriculum response to online safety, enabling learners and apprentices to learn about the risks of new technologies and social media and how to use these responsibly;
- ensuring a zero-tolerance approach to sexual violence and sexual harassment
- implementing a highly effective learner voice strategy that encourages learner feedback on experiences and ensuring they feel safe in and around the College estates
- ensuring that child protection is included in the curriculum to help learners and apprentices stay safe, recognise when they do not feel safe, identify who they can talk to and where they can get help from;
- ensuring access to a number of appropriate adults to approach if they are in difficulties;
- building confidence, resilience and independence
- ensuring access to a number of appropriate adults to approach if they are in difficulties;
- encouraging development of self-esteem and assertiveness while not condoning aggression or bullying;
- ensuring repeated hate incidents, for example racist, homophobic, gender or disabilitybased bullying are considered under child protection procedures;
- liaising and working together with other support services and those agencies involved in Safeguarding children; and
- monitoring children who have been identified as having welfare or protection concerns and providing appropriate support.

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8. Safeguarding Procedure

- 8.1 All staff will remain vigilant, act immediately on any safeguarding concerns, and not assume others will take action. The following steps must be taken (refer to **Annex 4** for full details of the steps to be taken):
 - Step 1: Listen carefully, stay calm, reassure the student, explain their right to be safe, and inform them that the information will be passed to Safeguarding staff. Record the conversation accurately, ask questions without leading, and reinforce that they did the right thing by speaking up.
 - Step 2: Take the student to Safeguarding immediately.
 - Step 3: Record the full conversation factually and promptly on CPOMS or contact Safeguarding in person if CPOMS is unavailable.
 - Step 4: Safeguarding staff will review reported concerns and refer significant or complex cases to the Multi-Agency Safeguarding Hub (MASH) for coordinated oversight.
- 8.2 The College recognises that safeguarding and child protection work can be stressful and will support staff by providing opportunities to discuss concerns with the Designated Safeguarding Lead or deputy and access further support as needed. Some useful 'Do's and Don't's' guidance is detailed in **Annex 5**.
- 8.3 We will seek to discuss safeguarding concerns with parents or carers and obtain their consent to refer cases unless doing so would place a learner at risk or cause further harm, with parental involvement prioritised unless Police or Children's Social Care are engaged first.
- 8.4 The College will maintain clear records of concerns securely, share information on a "need-to-know" basis, and cooperate fully with external agencies, ensuring staff explain that confidentiality cannot be guaranteed but information will only be passed to those who can help, in line with UK GDPR and the Data Protection Act 2018.

9. Confidentiality, communication, record keeping and information sharing

- 9.1 The College will ensure that information is shared promptly to identify and address all forms of abuse. While we follow the Data Protection Act 2018 and UK GDPR to process personal information securely, we will share information when a child may be at risk of harm.
- 9.2 The College will keep all child protection records confidential, allowing access only to those who need the information to safeguard children, and will record who has viewed the records, when, and why. Staff will be supported to share information appropriately, including without consent when necessary, to promote the welfare and safety of learners.
- 9.3 The College will co-operate fully with police and children's social care, sharing relevant information for child protection investigations in line with statutory guidance, including Working Together to Safeguard Children (2023) and Prevent and Channel guidance. Any member of staff will be empowered to contact children's social care if they have concerns about a young person (KCSIE).

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10. Allegations against staff and adults in a Position of Trust

- 10.1 The procedure for 'Reporting and Dealing with Allegations of Abuse against Members of Staff and Adults in a Position of Trust' applies to all staff, volunteers, supply staff, and contractors, covering allegations that either meet the "harm threshold" (serious risk or abuse of children/adults with care needs) or constitute "low-level" concerns that fall below this threshold.
- 10.2 Any allegation must be reported promptly to the Principal and CEO or a member of the Executive Team (via the Principal and CEO's Office). The Principal and CEO will liaise with HR colleagues, who in turn will contact the Local Authority Designated Officer (LADO) and, where necessary, the police or social care. Staff must not carry out their own investigations or take disciplinary action independently.
- 10.3 Where there is a concern/allegation about the Principal and CEO, this should be referred to the Chair of Governors or, in their absence, the Vice Chair. They will follow the process outlined in 9.2.
- 10.4 Concerns that do not meet the harm threshold must still be reported, recorded, and managed appropriately to ensure transparency and protect all parties. Records of all allegations, outcomes, and actions taken are retained securely, and unsubstantiated or malicious allegations are removed from personnel files.
- 10.5 All staff must refer to the 'Reporting and Dealing with Allegations of Abuse against Members of Staff and Adults in a Position of Trust' procedure for full details of the reporting procedure.

Preventing Radicalisation – The Prevent Duty 11.

- 11.1 Children may be susceptible to radicalisation into terrorism. Refer to Annex 6 for Indictors of Vulnerability to radicalisation
- 11.2 Prevent is one of four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of young and/or vulnerable people.
- 11.3 The Prevent Duty and Strategy seeks to:
 - Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
 - Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health
- 11.4 The Counter Terrorism and Security Act (2015) placed a duty on further education colleges and the College has a responsibility to ensure that all staff and learners have knowledge in recognising risk and addressing Prevent appropriately. Strategies to meet this obligation include:
 - To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism
 - Staff Induction and briefing sessions
 - **Enrichment sessions**
 - To create opportunities for open discussion and to listen and support the learner voice

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- To break down segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society.
- Promotion of British and our college values, namely democracy, rule of law, individual liberty, tolerance and respect for others.
- To ensure learner safety and that the College is free from bullying, risk, harassment and discrimination
- To provide support for learners who may be at risk and appropriate sources of targeted advice and guidance
- 11.5 Both staff and students receive Prevent Training and have instant access to resources to support their understanding.
 - All new learners receive a comprehensive induction including information on the Prevent Duty. The
 college commissions a Home Office approved provider to deliver theatre-based presentations
 during the induction period.
 - All staff will be offered training in order to understand factors which make learners vulnerable to extremist ideas and know what action they should take. Staff will be encouraged to complete the Home Office e-learning module on Prevent awareness.

12. Inter-Agency Working

- 12.1 We will develop and promote effective working relationships with other agencies, including agencies providing early help services, as well as the Police and Children's Social Care.
- 12.2 We will ensure that relevant staff members participate in multi-agency meetings, including early help meetings, child protection conferences and core groups.
- 12.3 We will participate in serious case reviews, other reviews and file audits as and when required to do so by our external safeguarding partners. We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

13. Contractors, Service/Activity Provider and Work Placement Providers

- 13.1 We will ensure that contractors and providers are aware of our College's Learner Safeguarding Adults at Risk and Child Protection Policy and Procedures. We require that employees and volunteers provided by these organisations use our procedure to report concerns.
- 13.2 We will seek assurance that employees and volunteers provided by these organisations and working alongside our learners and apprentices have been subjected to the appropriate level of Safeguarding check in line with Keeping Children Safe in Education: September 2025. If assurance is not obtained, permission to work with our young people or use our college premises will be refused.
- 13.3 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement, along with the requirement for them to have undertaken Safeguarding training appropriate to their role.

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- 13.4 Where students undertake work or industry placements, it is the responsibility of all staff involved to assess the suitability of the placement and the effectiveness of the employers' risk management arrangements.
- 13.5 It is the responsibility of all staff working with employers who provide training/activities for our learners to report any concerns regarding the suitability as placement providers regardless of the learner/apprentice age or mode of study.

14. Whistleblowing and Complaints

- 14.1 We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of Safeguarding and child protection, which may include the attitude or actions of colleagues. In the first instance, any concerns should be raised with the DSLs but if escalation of the issue is required, it should be raised with the Principal and CEO. If necessary, the Chair of the Governing body or the Local Authority Designated Officer (LADO) can be contacted if warranted by the situation.
- 14.2 Where a concern exists regarding a staff member and/or volunteer, the procedure for Reporting and Dealing with Allegations of Abuse against Members of Staff and Adults in a Position of Trust must be followed.
- 14.3 We have a Whistleblowing Policy which is available to all staff. This should be used when staff need to raise a concern that could be within the public interest to be explored.
- 14.4 The Compliments and Complaints procedure should be followed where children, parents and other people wish to report concerns or complaints, including abusive or poor practice.
- 14.5 We will actively seek the views of learners/apprentices, parents, carers and employers and staff members on our child protection and Safeguarding arrangements through surveys, questionnaires and other means.

15. Site Security

- 15.1 All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting any issues or concerns that may come to light.
- 15.2 We check the identity of all visitors coming into the College. Visitors are expected to sign in and out of our College and to display a visitor's badge while on the College site. Any individual who is not known or identifiable will be challenged for clarification and reassurance, this is the responsibility of all staff.
- 15.3 The College will not accept the behaviour of any individual, (parent, professional or anyone else) who threatens College security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse that person access to the College site.

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16. Policy Review

- 16.1 This policy and associated procedures will be reviewed every academic year by the Senior Designated Safeguarding Lead and approved by Executive Leadership Team and Governors.
- 16.2 The DSLs will ensure that staff members are made aware of any amendments to policies and procedures.

17. Types of Abuse, Neglect and Exploitation & Glossary

Glossary

A Glossary of key terminology can be found in **Annex 7**.

- 12.1 All staff must be aware of indicators of abuse, neglect and exploitation in order to identify cases of children who may need help and protection.
- 12.2 If staff are unsure, they should always speak to the designated safeguarding lead, or deputy.
- 12.3 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple cases will overlap with one another.
- 12.4 Information on the different types of abuse and steps to take can be found in **Annex 8**.

18. Annexes

Annex 1: Safeguarding Contact Details

Annex 2: Key Contacts

Annex 3: Safeguarding Referral Flowchart Annex 4: Procedure for Managing a Disclosure

Annex 5: Do's and Don'ts

Annex 6: Indicators of Vulnerability to Radicalisation

Annex 7: Glossary of Terminology

Annex 8: Types of Abuse, Neglect and Exploitation

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19. Approval

Approved by the Executive Leadership Team

Signed: (Principal and Chief Executive Officer)

Endorsed by the College Corporation

Signed: (Chair)

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