



POLICY NAME: 2025/26 SAFEGUARDING AND PREVENT POLICY
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PART A: SAFEGUARDING POLICY

1. POLICY STATEMENT AND LEGAL FRAMEWORK

1.1 Purpose and Aims of this Policy

This is statutory guidance from the Department for Education (the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18 (KCSIE 2025). KCSIE also applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.

Whilst the College's safeguarding duty under KCSIE is primarily to protect children under 18, our safeguarding responsibilities also extend to learners aged 18 at the point of enrolment onto a Study Programme, as well as to students aged 19–25 who have an Education, Health and Care Plan (EHCP).

In addition, the College recognises its duty of care towards Year 11 pupils undertaking provision with us, who remain children for safeguarding purposes.

It is essential that **everybody** working in a college understands their safeguarding responsibilities and that no single person or agency will hold the full picture for a learner/family. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play.

1.2 Policy Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with young people including the completion of risk assessments
- Ensure staff are appropriately trained
- Raise awareness of safeguarding/learner protection issues amongst all staff and volunteers and of what to do if they have concerns
- Ensure that volunteers have DBS checks and are appropriately supervised
- Ensure visitors, who do not have a DBS check, are accompanied at all times by a named member of staff

- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are resilient
- Ensure that links with relevant agencies are effective including partnership working regarding learner protection matters, including attendance at case conferences and core group meetings
- Create and maintain a safe college environment where learners feel secure and are encouraged to speak openly about any concerns they may have
- Ensure learners know there are trusted adults in the college who they can approach if they feel worried about anything
- Ensure that the curriculum and related provisions including Health and Wellbeing/Tutorials, support the development of learners' skills to help them feel safe and adopt safe, responsible practices
- Support for learners who have been abused or may be at risk of harm in accordance with any agreed learner protection plan
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer
- Ensure staff follow accepted "safe practice" principles when working with learners
- Ensure learners are protected from all forms of harm

This policy should be considered alongside other relevant policies, for example, Positive Behaviour Policy, SEND Code of Practice, Staff Code of Conduct, Whistleblowing, Safer Recruitment, Data protection, and online safety.

2. GOVERNANCE AND LEADERSHIP RESPONSIBILITIES

2.1 Role of the Governing Board and Executive Team

The Governing Board and Executive Team have a vital strategic role in safeguarding and promoting the welfare of children. They provide leadership, scrutiny, and assurance to ensure that safeguarding is embedded in the culture of the College. This includes:

- Setting the tone from the top to promote a safeguarding-first culture across all areas of the organisation
- Ensuring compliance with statutory duties and alignment with *Keeping Children Safe in Education 2025-26* and other relevant guidance
- Holding senior leaders to account for the effectiveness of safeguarding policies, procedures, and practice
- Receiving and scrutinising regular reports on safeguarding, child protection, and safer recruitment, and seeking assurance that actions are timely and effective
- Ensuring that sufficient resources, training, and support are in place to enable staff to fulfil their safeguarding responsibilities confidently and effectively
- Acting as critical friends to the Designated Safeguarding Lead (DSL) and senior leaders, providing constructive challenge and oversight to drive continual improvement

Through this active leadership and oversight, the Governing Board and Executive Team provide essential assurance to children, families, staff, and external partners that safeguarding is a shared, central priority.

2.2 Croydon's Children Families & Education Directorate

The Directorate includes services that will support the Croydon College to safeguard and promote the welfare of learners by:

- Coordinating the delivery of integrated children's services within the borough, including an early help service
- Providing statutory social services under the Children Act 1989/2004
- Providing Croydon College with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for learner protection, safeguarding and online safety
- Dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- Taking responsibility for those children who are not in education, including children who are known to be home educated

2.3 Governing Board Responsibilities

The Corporation will ensure that Croydon College meets its statutory duties about safeguarding and protecting learners and that the following are in place:

- Safeguarding policies and procedures covering early help and learner protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies
- A staff code of conduct policy including policies covering staff/learner relationships and communications and staff use of social media
- A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present
- The college can work jointly with other agencies in order to ensure learners can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored
- A member of staff is appointed as the Designated Manager to address allegations against college staff
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and learner protection policies and the staff code of conduct policy

- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice
- Steps are taken to ensure parents and learners are aware of the college's safeguarding and learner protection policies and procedures
- Governors ensure learners are given opportunities within the curriculum to learn how to keep themselves safe, including online
- Croydon College has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the college
- At least one member of the Governing Board has undertaken accredited safer recruitment training
- There is a nominated member of the Governing Board who is responsible for Safeguarding
- All staff receive safeguarding and learner protection training every year
- Croydon College has procedures in place to deal with allegations made against other learners
- Learners wishes and feelings are considered when deciding on what action to take

2.4 Principal's Responsibilities

The Principal will ensure that Croydon College meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the colleges' safeguarding and learner protection policies
- All staff are able to identify those learners who need extra help and know how to make or request appropriate referrals to early help
- All staff are vigilant to harm and abuse, can identify those learners for whom there are learner protection concerns
- Staff can work in partnerships with other agencies to safeguard learners
- Staff are encouraged to attend learning events and participate in audit activities provided by the Safeguarding Children Partnership
- A Designated manager is appointed to manage allegations against staff
- Safer recruitment practice is followed when recruiting to posts
- Croydon College offers a safe environment for staff and learners to learn
- Safeguarding issues are brought to the attention of the governing body when needed

3. STAFF ROLES AND RESPONSIBILITIES

3.1 Role of All Staff

All staff must:

- Understand their safeguarding responsibilities and that safeguarding is everyone's responsibility

- Be alert to signs of abuse and know what action to take if they have concerns about a learner
- Know how to respond appropriately to a learner who makes a disclosure
- Know how to record concerns and pass them on to the designated safeguarding lead
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe
- Never give the impression that a learner is creating a problem by reporting abuse, sexual violence or sexual harassment
- Be aware that technology is a significant component in many safeguarding and wellbeing issues

3.2 Induction and Training Requirements

The Principal will ensure that all staff are fully inducted and made aware of the following policies:

- Staff receive appropriate safeguarding and learner protection training (including online safety)
- Behaviour policy (including measures to prevent bullying)
- Staff code of conduct including low-level concerns, allegations against staff and whistleblowing
- The safeguarding response to children who are absent from education
- Role of the designated safeguarding lead and deputies

Staff will be asked to confirm that they have received, read, and understood all relevant staff policies, including "What to do if you are worried a learner is being abused" guidance and 'Keeping Children Safe in Education 2025 (part 1)'.

The designated safeguarding lead will ensure that all staff receive safeguarding and learner protection training on a two-yearly basis as a minimum. This will include online safety and AI.

4. CHILD PROTECTION DEFINITIONS

4.1 Safeguarding and Child Protection

Croydon College will carry out its duty to safeguard learners which is:

Protecting children from maltreatment	Preventing impairment of children's health or development
Ensuring children are growing up in circumstances consistent with the provision of safe and effective care	Undertaking that role to enable children to have optimum life chances so they can enter adulthood successfully

4.2 Types of Abuse and Neglect

Neglect: failure to provide basic care to meet the learner's physical needs, such as not providing adequate food, clothing or shelter. Failure to protect the learner from harm or ensure access to medical care and treatment.

Physical abuse: causing physical harm or injury to a learner.

Sexual abuse: involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

Emotional abuse: failure to provide love and warmth that affects the learner's emotional development. Psychological ill treatment of a learner through bullying, intimidation or threats.

PART B: SAFEGUARDING PROCEDURES

5. RECOGNISING AND RESPONDING TO CONCERNS

5.1 Early Help Cases

Staff will recognise children who may need additional support early on and take action to provide help, aiming to prevent issues from becoming more serious. They will pay particular attention to the needs of children in the following groups:

Children with disabilities and additional needs	Young carers	If the learner has a mental health need
Children showing early signs of being drawn into anti-social or criminal behaviour	Children who frequently go missing from home, college or care	Children who are misusing drugs or alcohol
Children at risk of criminal/sexual exploitation	Children at risk of being radicalised or exploited	A family member in prison or is affected by parental offending
Misusing drugs or alcohol themselves	Children who have returned home from care	Children who show early signs of abuse or neglect
Is at risk of 'so called' honour-based abuse, FGM or forced marriage	Is persistently absent from education	Privately fostered Children
Learner witnessing domestic abuse/violence	Parental offending	At Risk of being permanently excluded

If the learner requires an early help service from another agency, the Croydon College will make a referral to the Multi Agency Safeguarding Hub (MASH) for appropriate help and support. Staff will consult with parents *prior* to making any referral to discuss the matter and **gain consent** to refer to the learner.

5.2 Recognition of Abuse and Neglect

Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a learner are reported to the designated safeguarding lead.

Staff should refer to Annex B for abuse indicators that may suggest a learner may be at risk of suffering significant harm.

Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken.

Concerns may be monitored over time and should be recorded on a monitoring/incident form or logged within an online management system.

5.3 Dealing with Disclosures

When a learner makes a disclosure:

1. **Remain calm** and listen carefully without showing shock, disbelief, or judgement. Accept what the learner says without questioning its truth
2. **Allow the learner to speak freely**, without interrupting or pressing for details
3. **Offer reassurance** but avoid making promises you may not be able to keep—especially around confidentiality
4. **Reassure the learner** that they are not to blame and that they were right to speak up
5. **Avoid asking leading or direct questions**. Instead, allow the learner to share their experience in their own words
6. **Do not criticise** or make negative comments about the alleged perpetrator
7. **Explain clearly what will happen next**, including who you will need to inform and why
8. **Record the disclosure** accurately and promptly and pass the information to the Designated Safeguarding Lead as soon as possible

DO NOT DELAY - Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this.

MAKE WRITTEN NOTES - At the earliest opportunity make a written record of your concerns. Record facts accurately and do not express opinion. Notes should be legible, signed and dated/timed.

Do not take photographs of any physical injuries, record on a body map, do not use audio to record disclosures.

6. REFERRAL PROCEDURES

6.1 Making Referrals

Where possible, a decision on whether to refer a learner to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral, and *any* member of staff may make a referral if this is necessary.

Referrals should be completed using the MASH portal either by the teacher raising concerns or by the designated safeguarding lead. Urgent referrals will be accepted by telephone but must be confirmed in writing via the portal within 24 hours.

MASH Referral Portal: <https://ehmportal.croydon.gov.uk/web/portal/pages/help/apply/cpassess#h1>
[Croydon MASH - Referral Form](#)

Parental consent must be sought prior to the referral being made unless seeking consent would place the learner at risk of further harm, interfere with a criminal investigation or cause undue delay.

6.2 Referral for Statutory Social Work Intervention

When there are concerns about a learner's welfare, staff must act immediately by seeking advice from the Designated Safeguarding Lead or their deputy.

Following consultation, the DSL will determine whether a referral to children's social care via the MASH is required. Where the referral raises concerns that the learner is at risk of significant harm, the case will be triaged by Croydon's MASH team manager.

MASH will inform Croydon College of the outcome of any referral they make and what action children's social care will be taking. This may include:

- **Child in Need (CIN) Assessment** – Section 17, Children Act 1989
- **Child Protection (CP) Enquiry** – Section 47, Children Act 1989
- **Providing interim services** for the learner and their family
- **Families may also be referred** to Early help or signposted to universal services

6.3 Learners Who Need a Social Worker

Some learners may have an allocated social worker due to concerns such as neglect, abuse, or complex family circumstances. The local authority should ensure timely communication with the Designated Safeguarding Lead, so that colleges are aware when a learner has a social worker.

7. SPECIFIC SAFEGUARDING ISSUES AND PROCEDURES

7.1 Child-on-Child Abuse

Child-on-child abuse refers to any form of physical, sexual, emotional, or verbal abuse, or coercive and harmful behaviour, inflicted by one learner or young person onto another. This includes:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse including sexual violence and sexual harassment
- Abuse in intimate personal relationships between children (teenage relationship abuse)
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Initiation/hazing type violence and rituals
- Upskirting

There should be a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys".

7.2 Sexual Violence and Sexual Harassment

Sexual Violence refers to sexual offences under the Sexual Offences Act 2003: rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without consent.

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline.

Examples include:

- Sexual comments, jokes, taunting and sexual stories
- Physical behaviour, such as deliberately brushing against someone
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting
- Online sexual harassment

Key statutory requirements:

- A child under the age of 13 can never consent to sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- Creating and sharing sexual photos and videos of children under 18 is illegal

7.3 Gender-Based Violence (GBV) / Violence Against Women and Girls (VAWG)

Croydon College recognises that gender-based violence disproportionately affects women and girls, though it can impact learners of any gender. GBV includes a wide range of harmful behaviours such as sexual harassment, sexual violence, coercive control, domestic abuse, female genital mutilation (FGM), so-called honour-based abuse, and online harassment.

We acknowledge the national priority to tackle Violence Against Women and Girls (VAWG) and are committed to:

- Embedding a whole-college approach which challenges sexism, misogyny and harmful gender norms
- Providing clear reporting routes for learners who may be experiencing GBV
- Ensuring all staff are trained to recognise the signs of GBV and respond appropriately
- Working closely with statutory agencies, specialist services, and community organisations
- Supporting victims and survivors through pastoral, counselling, and academic adjustments

7.4 Prevention of Radicalisation and Extremism

Definitions:

- **Radicalisation:** the process of a person legitimising support for, or use of, terrorist violence
- **Extremism:** vocal or active opposition to fundamental values, including democracy, rule of law, individual liberty and mutual respect
- **Terrorism:** action that endangers or causes serious violence to a person/people

Under section 26 of the Counterterrorism and Security Act 2015, Croydon College has a duty to refer young people to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

Risk indicators include:

- Identity crisis, personal crisis, vulnerability through personal circumstances

- Unmet aspirations, criminality
- Contact with extremist recruiters, accessing extremist websites
- Possessing extremist literature, using extremist narratives

7.5 Female Genital Mutilation (FGM) Mandatory Reporting

Teachers have a specific legal duty to report known cases of FGM to the police (Section 5B of the Female Genital Mutilation Act 2003).

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or sister who has undergone FGM
- Girls withdrawn from PSHE
- Visiting female elder from country of origin
- Being taken on long holiday to country of origin

Symptoms that FGM may have taken place:

- Difficulty walking, sitting or standing
- Spending longer than normal in bathroom
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from college
- Reluctance to undergo medical examinations

7.6 Child Criminal Exploitation and County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas.

Key indicators:

- Missing episodes
- Unexplained gifts or money
- Changes in behaviour or appearance
- Association with older individuals
- Involvement in violence

County lines exploitation:

- Can affect any child or young person under 18, regardless of gender
- Can still be exploitation even if the activity appears consensual
- Often involves force, enticement, or threats of violence
- Is typified by power imbalance in favour of perpetrators

7.7 Children at Risk of Sexual Exploitation (CSE)

Child Sexual Exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under 18 into sexual activity in exchange for something the victim needs or wants.

Three main types:

1. **Inappropriate relationships:** Usually involves one abuser with inappropriate power over a young person
2. **Boyfriend/Girlfriend:** Seemingly consensual relationship that becomes abusive
3. **Organised exploitation and trafficking:** Victims trafficked through criminal networks

Indicators may include:

- Acquisition of money, clothes, mobile phones without explanation
- Gang-association and/or isolation from peers
- Unexplained absences from college
- Leaving home/care without explanation
- Excessive receipt of texts/phone calls
- Returning home under influence of drugs/alcohol • Inappropriate sexualised behaviour
- Relationships with controlling or older individuals

7.8 Serious Violent Crime

Staff should be aware of indicators which may signal that learners are at risk from or involved with serious violent crime:

- Increased absence from college
- Change in friendships and groups
- Relationships with older individuals or groups
- Significant decline in educational performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Under Croydon's weapons in colleges protocol, the police must be informed via 101 of any learners found in possession of a weapon in college.

7.9 Domestic Abuse and Operation Encompass

The Domestic Abuse Act 2021 recognizes the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Types of domestic abuse include:

- Intimate partner violence
- Abuse by family members

- Teenage relationship abuse
- Child to parent abuse

Operation Encompass operates in Croydon to ensure that when police are called to domestic abuse incidents involving children, the college is informed before the child arrives at college the following day.

7.10 Modern Day Slavery and National Referral Mechanism

Modern slavery includes human trafficking, slavery, servitude, and forced or compulsory labour. Individuals may be exploited through sexual exploitation, forced labour, domestic servitude, forced criminal activity, or removal of organs.

7.11 Online Safety

There is considerable risk to learners online, categorised within four areas:

Content: Being exposed to illegal, inappropriate, or harmful content **Contact:** Being subjected to harmful online interaction with other users **Conduct:** Online behaviour that increases likelihood of harm **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and financial scams

7.12 Looked After Children and Previously Looked After Children

Croydon College acknowledges that looked after children, previously looked after children, and care leavers may be particularly vulnerable due to their care status and experiences prior to entering care.

The college's designated teacher for LAC and care leavers has specialist knowledge and the designated safeguarding lead will consult with them whenever there are concerns about a looked after learner.

7.13 Learners with Special Educational Needs and Disabilities

Croydon college is aware that learners with SEND may face increased risks of harm and abuse online and offline. Barriers can exist when recognising abuse in learners with SEND including:

- Assumptions that indicators of abuse relate to the learner's disability
- Communication barriers and difficulties in reporting challenges
- Potential risk of peer group isolation
- Cognitive understanding difficulties with online content

7.14 Safeguarding Vulnerable Adults

The College recognises that we work with different adults within our education programmes including:

- Young adults with SEND and Education, Health and Care Plans
- Learners at Pathway Centres
- Adult learners studying ESOL
- Higher Education students

Vulnerable adults could include those who have mental illness, physical or sensory disabilities, learning disabilities, severe physical illness, substance misuse issues, or are homeless.

8. RECORD KEEPING AND INFORMATION SHARING

8.1 Safeguarding Records

All safeguarding monitoring records and child protection records relating to learners are highly confidential and will be kept in a designated file separate from the learner's education records.

Records should show:

- What the concerns were
- Whether information was shared with parents and their response
- What action was taken to refer concerns or manage risk
- Whether any follow-up action was taken
- How and why decisions were made
- Outcomes

8.2 Confidentiality and Information Sharing

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information **must not** be allowed to stand in the way of safeguarding.

Information sharing principles:

- Any information college staff learn about a learner will be kept private and only shared with other professionals if necessary
- For children under 12, parents must give permission to share information
- Young people aged 12-15 can give permission if they understand the situation
- Those aged 16-17 can give consent if considered able under Mental Capacity Act
- Where a learner is at risk of significant harm, colleges have a legal duty to share information

8.3 Working with Parents and Carers

Croydon College recognises the vital role that parents and carers play in safeguarding. The college will:

- Clearly communicate statutory safeguarding responsibilities
- Provide regular opportunities for parents to discuss concerns
- Involve parents in development and review of policies
- Maintain clear and accessible complaints procedure
- Offer advice and direct families to appropriate services

9. MULTI-AGENCY WORKING AND CASE MANAGEMENT

9.1 Attendance at Case Conferences and Core Groups

The designated safeguarding lead will liaise with social care to ensure all relevant information is provided during child protection investigations.

The designated safeguarding lead will ensure Croydon College is represented at child protection case conferences and core group meetings. Where possible, a member of staff who knows the learner best will attend.

9.2 Monitoring

Where a learner is subject to a child protection plan, monitoring will be carried out by relevant staff in conjunction with the designated safeguarding lead.

All information will be recorded on child protection monitoring/incident forms prior to each conference and core group meeting.

The designated safeguarding lead will notify the allocated social worker if the learner is removed from roll, suspended, permanently excluded or goes missing.

10. SAFER RECRUITMENT PROCEDURES

10.1 General Principles

Croydon College recognises safer recruitment practices are essential for creating a safe environment for learners. The college will carry out extensive checks and enquiries on applicants for all positions in accordance with statutory requirements.

All job advertisements and application forms will clearly state that the role is a safeguarding role and that safeguarding checks will be completed.

Staff and governors who sit on interview panels will have at least one member trained in safer recruitment.

10.2 Checks to be Carried Out

Croydon College will verify the following information for all new staff:

- The applicant's identity verified by passport or photographic ID and proof of address
- An enhanced DBS check (with children's barred list check)
- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to establish the person's right to work in the United Kingdom

10.3 References

- Applicants will provide full employment history and details of referees
- References will be requested directly from the referee before interviews
- References from colleagues will not be acceptable
- Open references will not be accepted
- Current employers will be contacted at senior level
- Any gaps in employment will be followed up

10.4 DBS Checks

Enhanced DBS checks with barred list checks will be taken out on individuals involved in regulated activity, defined as close, unsupervised contact on a regular basis involving:

- Teaching
- Training
- Supervising
- Care
- Guidance and advice
- Driving a vehicle
- Personal or intimate care

10.5 Agency Staff and Volunteers

- Written confirmation required that agency has carried out all necessary checks
- Written confirmation of outcome of all checks must be requested
- Volunteers carrying out regulated activity require enhanced DBS with barred list check
- Unsupervised volunteers will not be left alone or allowed to work in regulated activity
- Risk assessments will be carried out for volunteers not in regulated activity

11. ALLEGATIONS AGAINST STAFF

11.1 Conduct and Safe Teaching Practice

Croydon College expects staff and volunteers to set a good example through their conduct and behaviour. There is a written code of conduct in place that each member of staff and volunteer must sign.

The Corporation will appoint the Principal as the Designated Manager for allegations procedures. Allegations against the Principal will be referred to the Chair of the Governing Board.

11.2 Allegations that Meet the Harms Threshold

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a learner
- Possibly committed a criminal offence against/related to a learner
- Behaved towards a child in a way which indicates they would pose a risk of harm
- Behaved in a way that indicates they may not be suitable to work with young people

The head teacher/principal will always consult with the LADO immediately upon becoming aware of an allegation.

11.3 Low Level Concerns

A low-level concern is any concern that an adult working in or on behalf of the college may have acted in a way inconsistent with the staff code of conduct, but does not meet the harm threshold.

All concerns regarding staff conduct should be referred to the LADO to consider whether the threshold for LADO involvement is met.

Examples include:

- Being overfriendly with learners

- Having favourites
- Taking photographs of learners on mobile phone contrary to policy
- Engaging with learners one-on-one in secluded areas
- Humiliating learners

11.4 Whistleblowing

Croydon College is committed to fostering a culture of openness and transparency. All staff and volunteers have a legal and moral duty to report concerns where they believe individuals or the college may be failing in their responsibility to safeguard and promote welfare of learners.

Where it is not possible to raise concerns within the college, staff and volunteers may report concerns to:

- Croydon's lead officers for learner protection or safeguarding
- Croydon Council's confidential whistleblowing email: schoolwhistleblowing@croydon.gov.uk
- Ofsted whistleblowing line: 0300 123 3155
- NSPCC whistleblowing advice line: 0800 028 0285 or email help@nspcc.org.uk

12. HEALTH AND SAFETY AND RISK ASSESSMENTS

12.1 Responsibility for Health and Safety

The Governing Board and Principal will ensure there is a robust health and safety policy in place to meet statutory responsibility for safety of learners and staff within the college environment.

Day-to-day responsibility for health and safety issues will be delegated to a competent member of staff who has received appropriate training.

12.2 Risk Assessments

Croydon College will seek to identify and manage risk by using risk assessments carried out:

- On an annual basis for the college environment
- For college trips
- For learners travelling between locations during the college day
- For all work-based learning or work experience placements
- When a learner who has been excluded for risky or violent behaviour returns
- For any changes to the college environment or practices
- For any serious incident including serious youth violence or harmful sexual behaviour

12.3 Working with Aggressive and Violent Parents

Where colleges are working with families known to children's or adult social care, and concerns arise regarding behaviour of parents or carers towards college staff, these must be promptly discussed with the Principal and DSL.

If a parent or carer becomes abusive, threatening, or violent, staff should seek immediate support and contact the police to ensure safety of all college community members.

12.4 Site Security and Visitors

The Governing Board is responsible for security of college premises. The Principal will ensure that contractors have received appropriate level of DBS checks before being allowed access.

All visitors and contractors will be:

- Required to report to reception on arrival
- Expected to provide proof of identity
- Expected to wear identification when on premises
- Suitably supervised by college staff at all times
- Made aware of college's health and safety procedures

12.5 Use of College Premises by Other Organisations

Croydon College will only allow use of premises by other organisations outside college hours if:

- The college's incorporating document allows this
- The organisation provides overview of what it intends to teach
- The organisation can provide evidence of safer recruitment practices and requisite DBS checks
- Reasonable due diligence checks are completed on the organisation

13. SPECIFIC PROCEDURES FOR DIFFERENT SAFEGUARDING CONCERNS

13.1 Children Missing from Education

Prolonged or repeated absence from education can be an important indicator of safeguarding concerns, including neglect, child sexual exploitation, and child criminal exploitation.

The college's approach to managing persistent absence aims to support early identification of such risks and prevent learners from becoming missing from education.

13.2 Elective Home Education (EHE)

Where a parent or carer expresses intention to remove their learner from college to pursue elective home education, the college, local authority, and relevant professionals should work together to coordinate a meeting with parents/carers wherever possible.

In accordance with School Attendance (Child Registration) (England) Regulations 2024, a college must make a return to the local authority when a learner's name is deleted from the admission register.

13.3 Private Fostering

Private fostering relates to children under 16 (or under 18 if disabled) cared for by an adult who is not a close relative. The arrangement must be made by parents and in place for 28 days or more.

Colleges have a legal duty to notify Croydon of any learners they know to be privately fostered. The DSL should make a MASH referral if private fostering arrangements come to their notice.

13.4 Young Carers

If colleges have concerns about a learner they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339.

13.5 Homelessness

Being homeless or at risk of becoming homeless presents real risk to a learner's welfare. The DSL should be aware of how to refer/contact housing to raise/escalate concerns as soon as possible.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as family being evicted from property.

13.6 Children with Family Members in Prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

13.7 Children and the Court System

Children are sometimes required to give evidence in criminal courts. The college should be aware of the impact this may have on the learner and provide appropriate support.

14. CURRICULUM AND TEACHING SAFEGUARDING

14.1 Opportunities to Teach Safeguarding

The Governing Board should ensure the college provides opportunities for learners to learn about how to keep themselves safe, including online. These must be age appropriate and cater to individuals with specific needs.

General safeguarding themes are addressed across the college's broad and balanced curriculum through statutory Relationships Education, Relationships and Sex Education, and Health Education.

14.2 Online Safety Education

The college will ensure learners know how to remain safe online through:

- Age-appropriate online safety education
- Understanding of content, contact, conduct and commerce risks
- Regular updates on emerging online threats
- Clear reporting procedures for online concerns

14.3 Filtering and Monitoring

The college will:

- Designate specific roles and responsibilities for filtering and monitoring systems
- Conduct formal review of filtering and monitoring provisions at least annually
- Ensure harmful content is effectively blocked while maintaining reasonable access
- Implement robust monitoring strategies aligned with safeguarding requirements

15. MONITORING AND REVIEW

15.1 Policy Review and Monitoring

To enable monitoring of safety of premises, environment, and policy implementation, the Principal and governing board will ensure that:

- All policies are regularly monitored by DSL and annually reviewed by Principal and governing board
- College keeps central record of all accidents and incidents

- Staff are aware of responsibility to record accidents and incidents
- Principal has overview of all accidents/incidents
- Serious accidents and incidents are reported to Governing Board
- DSL ensures high standard of recording of all concerns about learners

15.2 Quality Assurance

All accidents and incidents are scrutinised regularly by the Corporation to identify problems or weaknesses around safeguarding policies and procedures or emerging patterns.

APPENDICES

Annex 1: Role of the Designated Safeguarding Lead

The designated safeguarding lead and their deputy take lead responsibility for safeguarding and child protection within Croydon College and must be available during college hours for staff to discuss safeguarding concerns.

The designated safeguarding lead will:

- Liaise with and manage referrals to relevant agencies such as Children's Social Care, LADO, Channel Panel, Police and DBS
- Keep the Principal informed of ongoing safeguarding and child protection issues
- Provide advice and guidance for staff on safeguarding issues and manage referrals

- Ensure college's safeguarding policies are up to date and consistent with CSCP policies
- Ensure all staff understand policies and procedures and can implement them
- Attend regular training including Prevent awareness training
- Work with Principal and relevant strategic leads
- Provide regular updates to staff and governors on changes in safeguarding legislation
- Liaise with mental health lead where safeguarding concerns link to mental health
- Have awareness of learners who may be in need, young carers and learners with SEND
- Liaise with designated teacher for CLA when there are safeguarding concerns
- Oversee child protection systems within college
- Provide link between college and other agencies
- Ensure staff receive appropriate safeguarding training every 2 years
- Ensure parents are aware of policies and procedures and kept informed
- Keep all records up to date and stored securely
- Ensure relevant records are passed on when learners transfer

Annex 2: Child Protection Definitions and Indicators

Possible indicators of abuse and neglect:

Type of Abuse	Indicators
Neglect	• Inadequate or inappropriate clothing • Appears underweight, constantly hungry • Failure to thrive physically, appears tired • Dirty or unhygienic appearance • Frequent unexplained absences • Lack of parental supervision
Physical Abuse	• Injuries inconsistent with explanation given • Injuries in unexpected places • High frequency of injuries • Parents unconcerned or fail to seek medical treatment

Sexual Abuse	• Sexual knowledge inappropriate for age • Sexual risk-taking behaviour • Inappropriate or excessive masturbation • Physical symptoms such as genital/anal injuries • Unwillingness to undress for sports
Emotional Abuse	• Developmental delay • Attachment difficulties • Withdrawal and low self-esteem
Indirect Indicators	• Sudden changes in behaviour • Withdrawal and low self-esteem • Eating disorders • Aggressive behaviour • Sudden unexplained absences • Drug/alcohol misuse • Running away/going missing

Annex 3: Useful Links and Information

Emergency and Key Contacts:

- Homeless-Intervention@croydon.gov.uk - for homelessness queries
- TApacements@lbcccloudadcroydongov.onmicrosoft.com - for Temporary accommodation
- HSG-PRIVATEHOUSING@croydon.gov.uk - for private accommodation disrepair issues
- Tenancy.Service@croydon.gov.uk - for council property tenancy issues

Online Safety Resources:

- DfE advice: Teaching online safety in schools
- UK Council for Internet Safety: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes' advice for education settings
- National Crime Agency CEOP Education Programme
- ThinkUKnow, Safer Internet Centre, Be Internet Legends

Additional Guidance:

- Working Together to Safeguard Children 2023
- What to do if you're worried a child is being abused 2015
- London Safeguarding Children Board child protection procedures

- Croydon Safeguarding Board local policies and procedures

Annex 4: Single Central Record (SCR) Template

The single central record should include details of all checks carried out for:

- All staff, including supply staff and teacher trainees on salaried routes
- Others who work in regular contact with children, including volunteers and governors
- For independent schools: all proprietorial body members and those involved in management

Required checks:

- Identity verification (passport/photographic ID and proof of address)
- Enhanced DBS check (with children's barred list check)
- Prohibition from teaching check
- Further checks on people who lived/worked outside UK
- Professional qualifications check
- Right to work in UK check

Annex 5: Safeguarding Procedures Quick Reference

Immediate Response to Concerns or Disclosures:

1. Stay calm and listen without judgement
2. Do not promise confidentiality
3. Record the disclosure in learner's own words
4. Report immediately to DSL or Deputy
5. If DSL unavailable and risk is immediate, contact MASH or police directly

Recognising Safeguarding Concerns:

- Physical, emotional, sexual abuse or neglect
- Peer-on-peer abuse including sexual violence and harassment
- Criminal or sexual exploitation, county lines, radicalisation, domestic abuse
- Learners missing from education or showing patterns of absence

Recording and Information Sharing:

- Record all concerns on MyPT
- Information must be shared with safeguarding professionals when child is at risk
- Parental consent should be sought unless doing so would increase risk

Making Referrals:

- DSL decides on referrals, consulting with staff and MASH where necessary
- Referrals made via MASH Portal (or by phone in urgent cases)

- If learner is at risk of significant harm, referral must not be delayed for consent
- Any staff member may make referral if necessary, but DSL must be informed

Specific Risks:

- FGM: Teachers have mandatory duty to report known cases to police
- Prevent: Concerns about radicalisation referred via MASH or Channel Panel
- Missing learners: Notify parents, DSL, and police if appropriate
- Operation Encompass: DSL acts on police notifications of domestic abuse **Escalation and**

Whistleblowing:

- If concerns not taken seriously, escalate to senior leaders or governing body
- Staff may contact LADO, MASH, or Ofsted directly
- Use Whistleblowing Policy if necessary
- If Croydon College does not think the learner's situation is improving within a reasonable timescale following referral, this should be taken up with social care via the Mash line or colleges can contact the LA education safeguarding lead to escalate using Croydon's Escalation and Resolution Policy: [56f06d_f7129426c4cd44c289ce6ba9accbad58.pdf](#)

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Annex 6: Glossary of Terms and Abbreviations

Key Terms and Abbreviations:

- **DSL** – Designated Safeguarding Lead
- **DDSL** – Deputy Designated Safeguarding Lead
- **KCSIE** – Keeping Children Safe in Education (statutory guidance)
- **LADO** – Local Authority Designated Officer
- **MASH** – Multi-Agency Safeguarding Hub
- **VAWG** – Violence Against Women and Girls
- **GBV** – Gender-Based Violence
- **SEND** – Special Educational Needs and Disabilities
- **LGBT+** – Lesbian, Gay, Bisexual, Transgender and other identities
- **FREDIE** – Fairness, Respect, Equality, Diversity, Inclusion and Engagement
- **GDPR** – General Data Protection Regulation
- **FGM** – Female Genital Mutilation
- **EHCP** – Education Health and Care Plan
- **CCE** – Child Criminal Exploitation
- **CSE** – Child Sexual Exploitation
- **CLA** – Children Looked After

- **CIN** – Child in Need
- **CP** – Child Protection
- **CSCP** – Croydon Safeguarding Children Partnership

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Related Policies: Behaviour Policy, Online Safety Policy, Staff Code of Conduct, Whistleblowing Policy, Safer Recruitment Policy