

Safeguarding and Prevent Duty Policy and Procedures

2025-2026

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1. Introduction

Capital City College (CCC) is fully committed to safeguarding and promoting the welfare of all learners, staff, volunteers, and visitors. Safeguarding is a fundamental part of our mission to provide a safe, inclusive, respectful, and supportive learning environment where all members of the college community can thrive and succeed.

This policy outlines our statutory responsibilities under key safeguarding legislation, including the Children Act 1989 and 2004, Keeping Children Safe in Education (KCSIE) 2025, the Counter-Terrorism and Security Act 2015 (Prevent Duty), and Working Together to Safeguard Children (2023). It ensures a consistent, whole-college approach to identifying, reporting, and responding to concerns, including those related to radicalisation, sexual harassment, and children missing from education.

2. Legislative Framework

Capital City College acknowledges and adheres to its legal and moral obligations to safeguard and protect children, young people, and adults at risk across all its educational provisions. This policy is shaped by, and compliant with several legislations and statutory guidance as outlined in Appendix 3.

3. Definitions

- **Child:** Anyone under the age of 18.
- **Adult at Risk:** A person aged 18 or over who needs care/support and is at risk of harm or unable to protect themselves.
- **Safeguarding:** Protecting from maltreatment, preventing impairment, ensuring safe care, and enabling best outcomes.
- **Prevent Duty:** Safeguarding learners from being drawn into terrorism.

4. Purpose and Scope

4.1 Purpose

This policy establishes Capital City College's approach to safeguarding, child protection, and Prevent Duty. It aims to:

- Establish clear safeguarding responsibilities and accountabilities across the college.
- Promote a proactive safeguarding culture and trauma-informed practice
- Ensure early identification and support for learners at risk of harm or exploitation.
- Provide assurance to learners, staff, guardians and partners of our commitment to safety and wellbeing.
- Support a collaborative, multi-agency approach to protecting children, young people, and adults at risk.
- Safeguard learners from risks both offline and online, including radicalisation, peer-on-peer abuse, and sexual violence or harassment.

4.2 Scope

This policy applies to:

- All learners (regardless of age, programme, or location of study).
- All staff (permanent, temporary, agency, and contractors).
- Volunteers, governors, external partners, visitors, and employers involved in work placements.
- All CCC provisions, including subcontracted, work-based, or online learning.

4.3 Safeguarding Principles

The College aims at all times to create and maintain a safe environment for all learners, staff, volunteers, and visitors. This policy is consistent with all other policies adopted by the college and in particular should be read in conjunction with the policies identified in Appendix 3.

The college upholds the following core principles:

- The welfare of the learner is paramount.
- All learners, regardless of background or identity, have equal rights to protection.
- Safeguarding is everyone's responsibility.
- A trauma-informed, inclusive, and learner-centred approach underpins our practice.
- Disclosures and concerns are taken seriously and addressed promptly.
- We are committed to a culture of listening to learners and valuing their voices.
- We are committed to safer recruitment practice and meeting Health and Safety requirements.

Special attention is given to vulnerable groups, including:

- Learners with Special Educational Needs or Disabilities (SEND),
- Looked-after children and care leavers
- Young carers
- LGBTQIA+ learners
- Learners experiencing abuse, neglect, or exploitation
- Learners with mental health needs

5. Roles and Responsibilities

Capital City College operates a robust safeguarding leadership structure with clearly defined roles and escalation pathways to ensure timely, effective responses to all safeguarding concerns

- **Governing Board**

The Board of Governors holds strategic accountability for safeguarding and will:

- Approve and review safeguarding policies annually.
- Receive regular safeguarding reports and data.

- Ensure statutory duties are met.
- Monitor safer recruitment practices and training compliance.

- **Safeguarding Governor**

The Designated Governor for Safeguarding (NGS) provides Board-level oversight of safeguarding and Prevent Duty compliance and acts as a direct link between the Governing Body and the College's Designated Safeguarding Lead (DSL).

- **Chief Executive Officer (CEO)**

The CEO leads by example in embedding a culture of safeguarding throughout the College and ensures safeguarding is prioritised in strategic planning, risk management, and resource allocation.

- **Designated Safeguarding Lead (DSL)**

The DSL is a senior member of the College Leadership Team and is responsible for:

- Overall leadership of safeguarding and Prevent strategy.
- Oversight of case management, training, and compliance.
- Liaison with external agencies including the Local Authority, LADO, and police.
- Providing safeguarding reports to the Executive Team and the Board of Governors.
- Chairing the college-wide Safeguarding Board.
- Single Point of contact for concerns related to radicalisation.

- **Deputy DSL / Head of Safeguarding and Wellbeing**

The Deputy DSL supports DSL with day-to-day operational management of safeguarding including:

- Supervision of the safeguarding Team and casework
- Leading on training, and quality assurance.
Liaising with local partners and overseeing complex referrals.
Acting as DSL in their absence.

- **Safeguarding Officers and Managers for centres**

Safeguarding Managers and Officers take responsibility for safeguarding with a specific center, department or student groups (e.g. KS4, Supported Learning) and:

- Are the first point of contact for concerns or disclosures.
- Carry out risk assessments and wellbeing checks.
Record, manage and escalate cases.
Engage with external agencies and services to support learners.

- **Designated Staff for Managing Allegations Against Staff (DSMAAS)**

The DSL and Chief Peoples Officer lead on managing all concerns or allegations about staff or volunteers, in accordance with KCSIE Part Four and Local Authority Designated Officer (LADO) procedures, ensuring due process and safeguarding standards are upheld.

- **All Staff and Volunteers**

All individuals working for or on behalf of the college must:

- Read and understand KCSIE Part 1 and sign an acknowledgment each academic year
- Complete mandatory safeguarding and Prevent training.
- Report concerns and disclosures promptly in line with the procedures outlined in this policy.
- Maintain appropriate professional boundaries at all times.

- **Learners**

- Are encouraged to speak up about concerns or experiences.
- Participate in tutorial and enrichment activities aimed at keeping safe.
- Engage in student voice activities and feedback forums.

- **Parents, Carers, and Partners**

- Are expected to support the college's safeguarding culture.
- Must follow safeguarding expectations during college interactions.
- Share relevant concerns and cooperate with early help interventions.

6. Prevent Duty

Under the Prevent Duty (2015), the college must safeguard learners from the risk of being drawn into terrorism, extremism, or radicalisation. This includes:

- Promoting British values and inclusive education.
- Identifying and referring vulnerable learners through Channel where appropriate.
- Staff training on Prevent indicators and local context.
- Provide training for staff on Prevent risks.
- Monitoring and filtering IT use to identify potential radicalisation risks.
- Working in partnership with local Prevent leads and authorities.

Prevent Duty is a safeguarding responsibility and is integrated into our overall safeguarding strategy.

7. Safeguarding Procedures

7.1 Reporting Concerns and Disclosures

All staff, volunteers, and contractors must follow these procedures without exception:

- **Immediate Reporting:** All concerns must be reported promptly using the college's secure system, MyConcern. For urgent concerns call the Safeguarding hotline 0207 832 5050.
- **Do Not Promise Confidentiality:** Learners must be informed that information will be shared with those who can help.
- **Recording:** Write a factual, dated account of the concern or disclosure. Include the learner's words where possible.

Where learners are on placements or attending provisions through subcontractors, it is the responsibility of the provision providers' safeguarding staff or Designated Person to manage any concerns, ensuring that there is good, effective and timely communication, liaison and information sharing with the college Safeguarding Team.

7.1.1 Managing Disclosures

The college recognises that responding to disclosures is challenging and emotionally demanding. All staff should follow the Guidance on Managing Disclosures (Appendix 8), which includes:

- Listening without judgment
- Remaining calm and supportive
- Recording factually, using the learner's words
- Referring immediately—never investigating or questioning further

7.2 Female Genital Mutilation (FGM) Mandatory Reporting Procedure

- Any immediate risk of FGM is a child protection concern and must be referred to Safeguarding Team without delay.
- If a learner under the age of 18 discloses that she has undergone Female Genital Mutilation (FGM), or a staff member observes signs indicating that FGM has been carried out (see *Appendix 4* for indicators), the Mandatory Reporting Duty applies.
- In these circumstances, the teacher and staff member must personally make an immediate report to the police by calling 101, and must also inform the Safeguarding Team as soon as possible.

8. Allegations and Low-Level Concerns about Staff and Volunteers

The college takes all allegations or complaints against staff, governors, agency workers, or volunteers seriously. Allegations involving inappropriate behaviour, misconduct, or potential harm to a learner will be investigated in accordance with both internal procedures and external statutory guidelines.

A low-level concern is any concern — no matter how small — that an adult working in or on behalf of the college may have acted in a way that is inconsistent with the staff Code of Conduct but does not meet the threshold for harm or a formal allegation.

8.2 Reporting Allegations and Low-Level Concerns

- Allegations and concerns about a member of staff or volunteer must be reported immediately to the Designated Staff for Allegations Against Staff (DSL or Chief Peoples Officer).
- Allegations are managed in line with KCSIE Part Four and local LADO procedures.
- No investigation should be initiated by staff; refer to Designated Staff for Allegations Against Staff.

Appendix 5 sets out the full procedure for managing allegations and low-level concerns

about staff and volunteers.

9. Recording, Case Management and Referrals

All safeguarding concerns about learners are securely logged using MyConcern, overseen by the Safeguarding team.

- Records are:
 - Confidential and kept separate from academic files
 - Include, details of the concern, dates, action taken and who and why decision are made
 - Chronological and detailed
 - Shared securely during learner transfers
- External referrals (e.g. children's social care, Channel) are made by safeguarding leads and tracked for outcomes.
- Subcontracted provision must maintain and share safeguarding records in line with college protocols.

10. Supporting Learners

The college takes a holistic approach to safeguarding and wellbeing:

- Learners have access to on-site and online welfare and wellbeing support, including mental health advice.
- Safeguarding is embedded in:
 - Induction
 - Tutorials
 - Enrichment
 - Learner campaigns
- Curriculum includes education on consent, healthy relationships, digital safety, radicalisation, mental health, and resilience.
- Early Help is prioritised, and referrals are made to external agencies including:
 - CAMHS (Child and Adolescent Mental Health Service)
 - Social Services
 - Housing and Youth Services

11. Criminal Convictions and Admissions

- All applicants must declare criminal convictions at the point of application or enrolment.
- Risk assessments are conducted in line with the Criminal Convictions and Risk Assessment Policy.
- False or withheld information may result in withdrawal of a place or disciplinary action.
- Where a conviction is revealed during a course, the college will assess the impact and determine appropriate next steps.

12. Information Sharing and Confidentiality

The college respects the right of learners and families to have their personal information treated respectfully and confidentially in line with General Data Protection Regulations (2018) and local statute and guidance.

- All staff must be aware of their responsibility to share information with the appropriate Designated Person and with other agencies to protect and safeguard learners.
- Information is shared on a need-to-know basis under UK GDPR. Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a learner.
- No staff may promise confidentiality if a learner is at risk.
- Learner consent is respected unless there is risk of harm. Where a learner has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the learner.
- Learner disclosures and decisions to share information must be clearly recorded, including:
 - Reasons for sharing
 - Who was informed
 - Actions taken

13. Safeguarding Training

Safeguarding our learners is a key priority for the college and we are committed to ensuring that all staff are well trained and feel confident in carrying out their safeguarding duties and responsibilities.

- All staff receive:
 - Induction safeguarding and Prevent training
 - Annual refresher training
 - DSL-led briefings
- Designated staff receive enhanced training every 2 years
- Training is quality-assured and evaluated for impact.
- A central record of training attended will be held in Human Resources.
- Staff working on behalf of CCCG (e.g. contractors) must demonstrate training

14. Safer Recruitment and Workforce Management

The college follows Safer Recruitment procedures in line with KCSIE 2025 and its internal recruitment policies:

- Enhanced DBS checks and barred list checks are mandatory where applicable.
- Online checks form part of due diligence for shortlisted candidates.
- 5-year rechecks, and annual self-declarations are required.
- Agencies must provide evidence of pre-employment checks.
- A minimum of one panel member in every interview will be Safer Recruitment trained.
- Staff receive full induction including safeguarding policies, the Code of Conduct, and whistleblowing procedures.

15. Staff Code of Conduct

All staff are expected to:

- Maintain professional boundaries.
- Avoid any behaviour that could be interpreted as grooming, coercive, or inappropriate.
- Declare any existing personal relationships with learners.
- Physical contact must be minimal, appropriate, and necessary (e.g. providing care or training in dance or sport).
- Breaches may result in disciplinary action or LADO referral.

See CCC Code of Conduct for full details.

16. Attendance and Safeguarding

- Attendance and safeguarding are closely interconnected. Persistent or unexplained absence can be an indicator of underlying safeguarding concerns, including neglect, abuse, exploitation, or mental health difficulties.
- All staff have a responsibility to be alert to patterns of absence or changes in attendance that may raise safeguarding concerns. Teachers, tutors, and support staff must monitor their learners' attendance and promptly report any unusual, persistent, or concerning patterns to the Safeguarding Team.

17. Online Safety and E-Technology

The college recognises the increasing importance of protecting learners from online risks, including exposure to inappropriate content, exploitation, grooming, and cyberbullying. The college ensures:

- A comprehensive E-Safety Policy, CCC AI Police and Acceptable Use Agreement are in place for learners, staff, and visitors.
- Online safety is taught as part of the induction and tutorials.
- Learners are educated about:
 - Safe use of social media
 - Recognising and reporting online abuse
 - Cyberbullying and sextortion
- The college employs robust filtering and monitoring systems to detect harmful and illegal content or activity.
- The Safeguarding Team monitor online safety incidents and coordinate appropriate action.

18. Work Experience, Placements and Work Based Learning

The college ensures that all work placements and work-based learning opportunities are underpinned by safeguarding best practice. The college will:

- Carry out safeguarding risk assessments for all placements.
- Ensure employers and providers:
 - Are briefed on safeguarding expectations.
 - Provide DBS-cleared staff where appropriate.

- Understand how to report safeguarding concerns.
- Learners are briefed before placements on safety, conduct, and reporting procedures.
- Staff are assigned to monitor safeguarding arrangements for placements.
- All work experience placements must be risk assessed, and providers briefed on safeguarding expectations.
- External providers must evidence appropriate safeguarding measures, DBS-cleared staff.
- Staff must know how to report safeguarding concerns during placements.

19. Centre Security and Contractors

- All staff, learners, and visitors must wear visible college-issued ID badges and lanyards.
- Entry screening may be conducted in accordance with the Screening and Search Policy.
- All visitors will be provided with Safeguarding Information and who to contact to report concerns.
- Contractors who have not undergone DBS checks are always supervised.
- Regular contractors must:
 - Provide evidence of DBS checks.
 - Acknowledge the Safeguarding & Prevent Policy.

20. External Providers and Lettings

- External providers must evidence their safeguarding procedures and staff vetting processes.
- Lettings and external events are only approved when appropriate safeguarding assurances are in place.
- All external speakers and events undergo a risk assessment in accordance with the External Speakers and Events Policy.

21. Working in Partnership with Parents and Carers

The college is committed to creating and maintaining a culture of openness and honesty and always strive to work in partnership with parents and carers. We believe that this is in the best interests of learners and their families.

- The College will share Safeguarding policies with parents and carers through its website and Guardian Portal.
- The college will provide updates to parents and carers on major safeguarding matters.
- Parental and carer involvement is sought unless doing so risks harm to the learner.

22. Whistleblowing

As stated in KCSIE 2025 'all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. Appropriate whistleblowing procedures are in place for such concerns to be raised with the college Executive Leadership Team.

23. Complaints

Complaints about the handling of safeguarding issues should be sent to the DSL. If the complaint is about the DSL, it will be dealt with via the college complaint procedure.

24. Monitoring and Review

Safeguarding practices are regularly monitored and evaluated to ensure compliance, effectiveness, and continuous improvement. We will:

- Conduct internal case audits to check referral outcomes and quality of response.
- Perform on-going training compliance audits
- Complete an annual safeguarding and prevent self-assessment.
- Maintain and review a Safeguarding and Prevent Duty Risk Register termly via the Safeguarding Board.
- Participate in multi-agency reviews and implement recommendations
- Gather learner voice feedback to inform practice and policies.

The policy is formally reviewed annually, or earlier by the Board of Governors in response to:

1. Changes in legislation or national guidance
2. Emerging safeguarding risks
3. Significant internal incidents

The DSL provides reports to the Governing Body covering:

- Safeguarding and Prevent case data
- Training updates
- Trends and emerging issues
- Incidents and actions taken to address them

Appendix 1: Key Safeguarding Personnel and contact information

1. Contact details

Safeguarding hotline: 0207 832 5050

Email: safeguarding@capitalccg.ac.uk

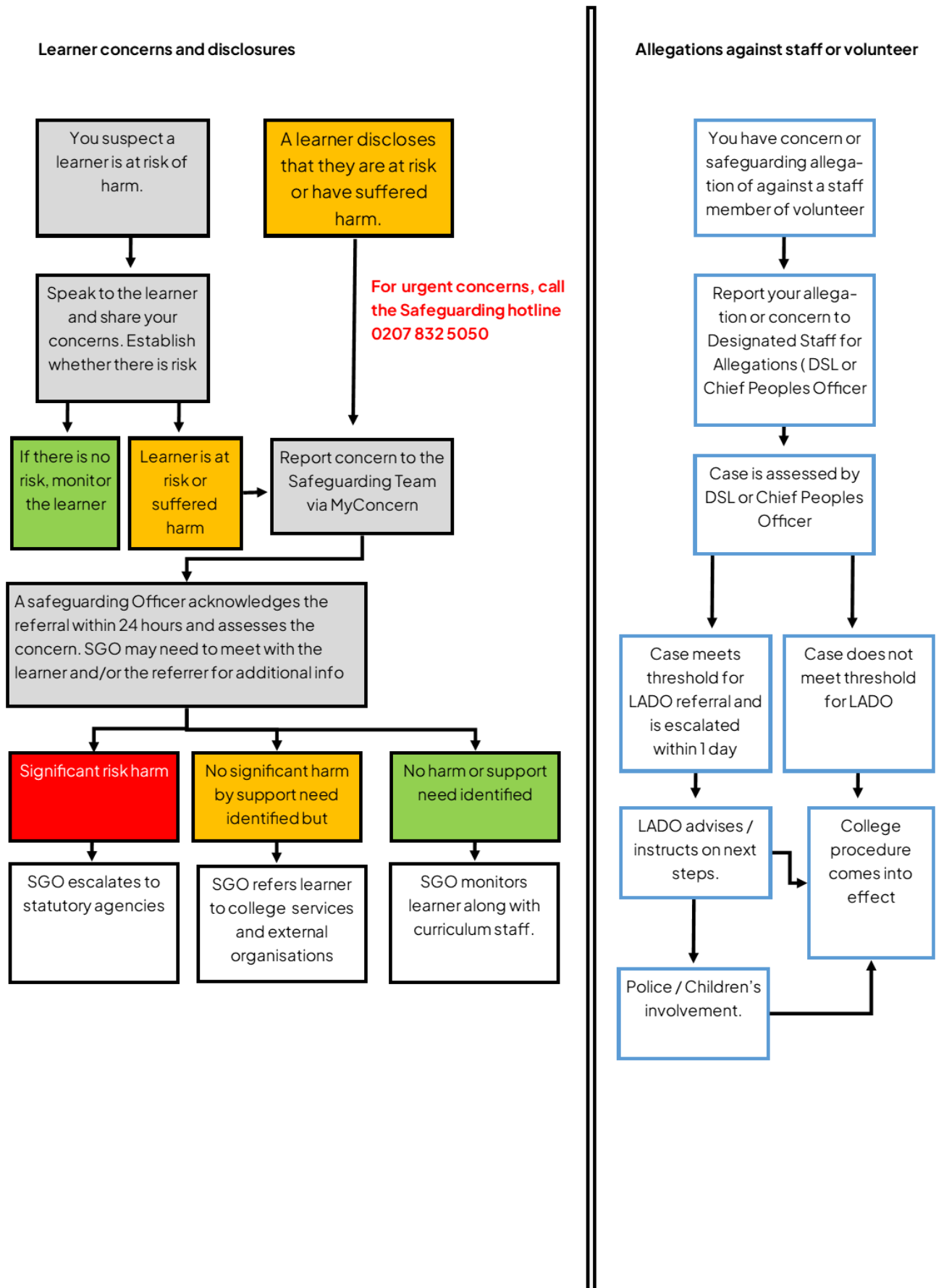
2. Safeguarding contacts for centres and cross college

Centre	Name	Safeguarding role
Cross college	Brooks Seyoum	Designated Safeguarding Lead / Designated Staff for Allegations Against Staff and Single Point of Contact
	Trovane Hartley	Designated Staff for Allegations Against Staff
	Steve Boyo	Deputy DSL /Head of Safeguarding & Wellbeing
Angel	Meldip Kaur Uppal	Safeguarding Officer
Enfield	Lei Mclean	Safeguarding Officer
Finsbury Park	Marvin Johnson	Safeguarding & Wellbeing Manager
Holloway	Richard Elliott	Safeguarding Officer
King's Cross	Alex Whitmarsh	Safeguarding Officer
Regent's Park	Ruth Jno Baptiste	Safeguarding & Wellbeing Manager
Soho	Grace Bowman	Safeguarding Officer
	Frankiie Joseph	Safeguarding & Wellbeing Manager
Tottenham	Sandra Barrat	Safeguarding Officer
Westminster	Abena Opong	Safeguarding Officer

3. Safeguarding contacts for specialist provisions

Provision	Name	Centre	Contact number
KS4	Elizabeth Edwards	Tottenham, Finsbury Park	0208 442 3161
SEND	Laura Edwards	Alexandra Centre	0207 832 5415
	Chritopher Egwuma		0207 802 8835
	Genevie Osborne-James	Kennet West and King's Cross	0207 391 6474
	Reece Luxford	Finsbury Park	0207 704 7229
	Ines Grilo Frieg	Enfield	0207 832 5079
Applications &Enrolment	Theo Ellis	Cross College	0208 442 3104

Appendix 2: Safeguarding Reporting Procedure flowchart



Appendix 3: Legal Framework, Statutory Guidance and Linked CCC Policies

Capital City College acknowledges and adheres to its legal and moral obligations to safeguard and protect children, young people, and adults at risk across all its educational provisions. This policy is shaped by, and compliant with several legislations and statutory guidance including:

- Children Act 1989 and 2004
- Education Act 2002, Section 175
- Education Act 2002
- Education and Inspection Act 2006
- Care Act 2014 (adults at risk)
- Serious Crimes Act (2015)
- The Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- School Staffing (England) Regulations 2009 (as amended)
- Equality Act 2010
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Sexual Offences Act 2003
- The Education (Pupil Registration) (England) Regulations 2006 (as amended)
- Mental Capacity Act 2005
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Rehabilitation of Offenders Act 1974 and Legal Aid, Sentencing and Punishment of Offenders Act 2012)
- GDPR 2018 and Data Protection Act 2018
- Working Together to Safeguard Children, 2023
- *Keeping Children Safe in Education (KCSIE), 2025*

CCC policies and procedures that relate to this policy include:

- Positive Behaviour Policy
- Criminal Convictions and Risk Assessment Policy
- Whistleblowing Policy
- Health and Safety Policy
- External Speakers & Event Policy
- Screening, Searches and Confiscation Policy
- Complaints Procedure
- ICT Acceptable Use policy
- AI Policy
- Equality Diversity & Inclusion Policy

All policies and procedure can be access by scanning the QR code below.



Appendix 4: Indicators and Signs of Abuse, Neglect, and Exploitation

Indicators and Signs

This appendix is intended as a reference guide for all staff to help recognise the signs of abuse and neglect in children, young people, and adults at risk.

Important Notes

1. These indicators are not exhaustive.
2. One sign alone may not mean abuse, but patterns, context, and professional curiosity are key.
3. Staff must not investigate—all concerns go to the DSL.
4. Early reporting allows for timely intervention and support.

Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm.

Possible indicators:

- Unexplained injuries, bruises, burns, or bite marks.
- Injuries in unusual places (e.g., back, thighs, upper arms).
- Frequent absences, possibly to hide injuries.
- Reluctance to change clothes for PE or show skin.
- Flinching when approached or touched.
- Reports of harsh physical punishment.

Emotional Abuse

Persistent emotional maltreatment that impacts a child's emotional development. Often present with other forms of abuse.

Possible indicators:

- Low self-esteem, excessive withdrawal, or fearfulness.
- Overly anxious, clingy, or attention-seeking behaviour.
- Delayed development without medical reason.
- Persistent criticism, humiliation, or rejection.
- Inappropriate emotional responses or lack of emotion.
- Avoidance of certain individuals.

Sexual Abuse

Involving forcing or enticing a child to take part in sexual activities, including online.

This may be physical contact or non-contact activities (e.g., exposing children to sexual images, encouraging inappropriate behaviour,).

Possible indicators:

- Sexual knowledge or behaviour inappropriate for age.
- Sudden avoidance of certain people or places.
- Difficulty walking or sitting.
- Sexually transmitted infections or pregnancy.
- Recurrent nightmares or bedwetting.
- Use of sexual language or drawings or use of AI to produce illicit images.
- Self-harm or extreme emotional reactions.

Neglect

Persistent failure to meet basic physical or psychological needs, likely to result in serious harm.

Possible indicators:

- Poor hygiene, unwashed clothing.
- Inadequate clothing for weather conditions.
- Frequent hunger, hoarding or stealing food.
- Untreated medical issues.
- Fatigue, falling asleep in class.
- Irregular or non-attendance.

Specific Safeguarding Concerns

Child Criminal Exploitation (CCE) & County Lines

- Unexplained money, gifts, or new possessions.
- Frequent absences or going missing.
- Relationships with older individuals or gangs.
- Excessive secrecy around mobile phone use.
- Being seen in different locations without explanation.

Child Sexual Exploitation (CSE)

- Sudden change in appearance or behaviour.
- Older boy/girlfriend or controlling relationships.
- Staying out overnight or disappearing for days.
- Inappropriate sexualised behaviour.
- Being picked up in cars by unknown adults.

Radicalisation and Extremism

- Sudden changes in identity, dress, or appearance.
- Isolating from friends and family.
- Using extremist language or expressing extremist views.
- Accessing extremist material online.

FGM

FGM involves the partial or total removal of the external female genitalia for non-medical reasons. It is illegal in the UK and considered a form of child abuse and violence against women and girls.

Key Risk Factors

- Girls from countries or communities where FGM is practiced.
- Families with a history of FGM.
- Mothers or sisters who have undergone FGM.
- Visiting countries where FGM is common, especially during school holidays.
- Isolated communities with strict cultural traditions.

Harmful Sexual Behaviour (HSB)

- Sexual activity between children of significantly different ages or developmental stages.
- Using sexual threats or coercion.
- Viewing pornography excessively, especially violent or age-inappropriate content.

Domestic Abuse

- Changes in behaviour such as aggression, withdrawal, anxiety.
- Frequent absences.
- Poor concentration or attainment.
- Reluctance to go home.

Adults at Risk

Indicators may mirror those above but also include:

- Unexplained injuries or frequent hospital visits.
- Withdrawal from services or social activities.
- Financial exploitation (sudden loss of assets, unusual spending).
- Poor living conditions or self-neglect.
- Being prevented from speaking freely.

- Difficulty walking, standing, or sitting.
- Frequent urinary or menstrual problems.
- Pain, bleeding, or signs of infection in the genital area.
- Recurrent vaginal discharge or discomfort.
- Avoiding physical activities or changing clothes.
- Anxiety, withdrawal, or depression.
- Talking about “special ceremonies” or family traditions.

Possible Signs & Indicators

- Fear of medical exams or going abroad.
- Sudden absences from college, especially after holidays.

Appendix 5: Safeguarding allegations and low-level concerns about staff and volunteers

The college takes all allegations or concerns about staff, governors, agency workers, or volunteers seriously. Allegations involving inappropriate behaviour, misconduct, or potential harm to a learner will be investigated in accordance with both internal procedures and external statutory guidelines.

Definitions

- **Allegation**

A safeguarding allegation is when it is alleged that an adult who works with children, young people, or adults at risk has:

1. Behaved in a way that has harmed, or may have harmed, a child or adult at risk.
2. Possibly committed a criminal offence against, or related to, a child or adult at risk.
3. Behaved towards a child, young person, or adult at risk in a way that indicates they may pose a risk of harm.
4. Behaved in a way in their personal life that raises safeguarding concerns (including online behaviour).

- **Low-Level Concern**

A low-level concern is any behaviour towards a child, young person, or adult at risk that does not meet the harm threshold above but is inconsistent with the College's Code of Conduct and/or the standards expected of staff. Examples include:

- Being over-familiar with students.
- Using inappropriate language or jokes.
- Favouritism towards particular students.
- Inappropriate communications via personal social media.

Low-level concerns help identify patterns of behaviour at an early stage before they escalate.

Reporting

- **Who Can Report**

- Any student, staff member, volunteer, contractor, parent/carer, or member of the public.
- Concerns can be raised anonymously, though this may limit the ability to investigate fully.

- **How to Report**

- All allegations and low-level concerns must be reported to the **Designated staff for Allegations (DSL or Chief People's Officer)** without delay.
- If the concern is about the DSL, it must be reported directly to the **Chief Peoples Officer** (or Chair of Governors for concerns about the CEO).
- Reports can be made verbally but must be followed up in writing.

Immediate Actions Upon Receiving a Concern

- **Allegations**

Where the allegation meets the threshold for potential harm:

1. Immediate safety – take steps to protect the child, young person, or adult at risk.
2. Record – make a clear, factual record of the concern, signed and dated.
3. Inform – the DSL must contact the Local Authority Designated Officer (LADO) within one working day.
4. No internal investigation should be initiated until advised by the LADO/police.

5. Suspension may be utilised. This will be based on identify risk and/or on the advice of the LADO.

- **Low-Level Concerns**

1. The DSL or Chief Peoples Officer will record the concern.
2. The concern will be reviewed to determine if it is truly low level or meets the threshold for an allegation.
3. Appropriate action may include:
 - Informal advice or training.
 - Reviewing the Code of Conduct with the staff member.
 - Monitoring for patterns of behaviour.

- **Investigation**

- **For allegations** – the college will follow the LADO’s advice, which may involve police, social care, or internal investigation.
- **For low-level concerns** – investigate proportionately, ensuring fairness and the right to respond.
- Keep detailed written records of all actions, outcomes, and decisions.

- **Possible Outcomes**

Allegation investigations can conclude as:

- **Substantiated** – evidence supports the allegation.
- **Unsubstantiated** – insufficient evidence to prove or disprove.
- **Unfounded** – no evidence or the concern is mistaken identity.
- **Malicious** – deliberately invented or false.
- **False** – evidence disproves the allegation.

Low-level concerns outcomes can include:

- No further action (with justification recorded).
- Informal management action.
- Further training or mentoring.
- Escalation to allegation procedure if new evidence emerges.

- **Confidentiality and Record Keeping**

- All records will be kept securely in line with Data Protection Act 2018 and UK GDPR.
- Low-level concerns will be retained in a separate log, not as part of the staff member’s formal disciplinary record unless repeated or escalated.
- Information will be shared on a need-to-know basis only.

- **Referral to the DBS or Teaching Regulation Agency**

- If an individual is dismissed or would have been dismissed due to safeguarding concerns, the DSL/Chief Peoples Officer must refer them to the Disclosure and Barring Service (DBS) and, where appropriate, the Teaching Regulation Agency (TRA).

- **Learning and Review**

- The DSL/Chief Peoples Officer will review low-level concerns logs periodically to identify patterns.
- Safeguarding reports to Safeguarding Board and Governors will include anonymised data on allegations and low-level concerns.
- Procedures will be updated in line with statutory guidance.

Appendix 6 : Sexual Harassment and Sexual Violence Guidance

Sexual harassment is recognised as a form of abuse and may constitute a safeguarding concern under Keeping Children Safe in Education (KCSIE) 2025 and the Sexual Offences Act 2003. It may also be linked to criminal exploitation, peer-on-peer abuse, online abuse, and domestic abuse.

Definitions

Sexual Harassment

Unwanted conduct of a sexual nature that can occur online or offline, and which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Examples include:

- Sexual comments, jokes, or taunting.
- Unwanted physical contact.
- Displaying or sharing sexual images, emojis or drawings.
- Online sexual harassment, such as non-consensual sharing of sexual images, upskirting, sexualised online bullying, unwanted sexual comments on social media, or coercion to share sexual images ("sexting" or "youth-produced sexual imagery").

Sexual Violence

Offences under the Sexual Offences Act 2003, including:

- Rape.
- Assault by penetration.
- Sexual assault.
- Causing a person to engage in sexual activity without consent.

Harmful Sexual Behaviour (HSB)

Sexual behaviour expressed by children, young people, or adults at risk that is developmentally inappropriate, harmful to self or others, or abusive.

Principles

- All disclosures of sexual harassment or sexual violence will be taken seriously, recorded accurately, and addressed promptly.
- Victims will be believed, supported, and protected throughout the process.
- Staff will respond in line with the Safeguarding and Prevent Policy and Procedures and refer concerns to the Safeguarding Team without delay.
- The wishes of the victim will be considered when determining the response, but the College has a duty to act to safeguard all learners.
- Allegations will be assessed in context, considering patterns of behaviour and the possibility of wider safeguarding concerns.
- Online incidents will be treated with the same seriousness as in-person incidents.
- Staff should promote respectful relationships, consent, boundaries, and equality.
- Sexist attitudes, derogatory language, and inappropriate behaviours must be challenged consistently.

Reporting and Responding

- All staff have a duty to report concerns, disclosures, or allegations to the Safeguarding Team immediately.
- The Safeguarding Team will:
 - Assess the risk and take protective measures.
 - Record the incident on the safeguarding reporting system.
 - Decide on referral to police, social care, or other agencies.
 - Arrange appropriate support for the victim and, where appropriate, the alleged perpetrator.
- Support may include pastoral care, mental health services, academic adjustments, and safeguarding plans.

Appendix 7: Missing from Education (CME) Guidance

Capital City College recognises that learners missing education, or with irregular attendance, are at **significant risk of harm**. This includes risks from:

- Neglect
- Abuse
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Forced marriage
- Honour-based abuse
- Radicalisation and extremism

In accordance with Keeping Children Safe in Education (KCSIE) 2025, the College will work proactively to identify, investigate, and address patterns of non-attendance, ensuring timely interventions.

Definition

A **child missing from education** is a learner of compulsory school age who is:

- Not on any school/college roll, **and**
- Not receiving suitable education otherwise (e.g., home education), or who has **ceased attending** without explanation or appropriate authorisation.

For learners aged 16–18, persistent absence or sudden withdrawal may also indicate vulnerability and will be treated as a safeguarding concern.

Roles and Responsibilities

- **All staff** must:
 - Be alert to patterns of absence, punctuality issues, or unexplained disappearances.
 - Report concerns
- **The Safeguarding Team** will:
 - Investigate all unexplained absences promptly.
 - Work with teachers to track learners.
 - Liaise with the local authority, social care, and police where necessary.
- **Curriculum staff** must
 - Maintain accurate and up-to-date attendance registers.
 - Follow College absence procedures, including same-day contact with parents/carers.

Procedures

- **Same-Day Follow-Up:** Where a learner is absent without notification, the teacher/tutor will contact the parent/carer (or learner, if over 18) by phone, email, and/or text on the first day of absence.
- **Escalation:** If no contact is made within 10 working days (or sooner if there are known safeguarding concerns), the Safeguarding Team will:
 - Conduct a welfare check (directly or via partner agencies).
 - Make a formal referral to the local authority CME team and/or social care.
- **Local Authority Notification:**
 - CCC will notify the LA of any learner under 18 removed from roll other than by completion, in line with Education (Pupil Registration) (England) Regulations 2006.
 - CCC will cooperate fully with LA investigations into CME cases.
- **Re-Engagement Support:** Learners returning after prolonged absence will receive an induction/welcome-back plan, including pastoral and academic support.

Vulnerability Indicators

Learners missing education may be at heightened risk if they:

- Have a history of CSE, CCE, or trafficking.
- Have mental health concerns.
- Are young carers.
- Are experiencing domestic abuse.
- Are seeking asylum or are refugees.
- Are subject to a Child in Need or Child Protection Plan.
- Have SEND without adequate support.

7. Prevention

- CCC will promote good attendance through curriculum engagement, pastoral support, and early help referrals.
- Staff will challenge any normalisation of poor attendance and maintain high expectations for learner participation.
- Attendance patterns will be monitored weekly, with interventions for at-risk learners.

Appendix 8: Managing Disclosure Guidance for Staff

Core Principles

- **Stay calm** and listen carefully.
- **Believe the individual** and take their disclosure seriously.
- **Reassure them** that they have done the right thing by telling you.
- **Do not promise confidentiality** – explain that you must pass the information on to keep them safe.
- **Report immediately** to the Safeguarding Team.

Approach – Ask and Assess

- Open the conversation
- Ask the *Safeguarding Question*. – e.g. *How are you, are you okay?*
- Set aside any judgments you may hold
- Resist the temptation to give advice, argue or deny their feelings/experience

Give Support and Listen

- Listen without interrupting
- Encourage the learner to talk
- Ask appropriate clarifying question
- Give reassurance but don't make promises
- Do not ask the learner to repeat their disclosure
- Reflect back what the learner has said using minimal prompts (Mmm, Ah, etc.)
- Silence can be supportive
- Open body language
- Comfortable eye contact
- Don't offer glib advice e.g., cheer up, things could be worse
- Do not assign blame or criticise the alleged perpetrator in front of them.

Record and Report

- Make an accurate, factual record as soon as possible after the conversation.
- Use the words spoken by the learner not your interpretations or 'proper' words
- Record other non-verbal behaviour which the learner might exhibit
- Do not destroy your original notes – they may be asked for later. Scan these and store secure or upload on MyConcern

Immediate Actions

1. **Ensure safety** – If the individual is in immediate danger or requires urgent medical attention, contact emergency services (999) first, then inform the Safeguarding Team.
2. **Contact the Safeguarding Team** straight away.
3. **Record the disclosure** factually on the safeguarding reporting system or using the official concern form.
 - Include: date, time, location, names, and exact words spoken where possible.
 - Distinguish clearly between fact, observation, and your opinion.