

2025-2026 Safeguarding Policy, Guidelines and Procedures

[Document Reference: SG]

Document administration

Policy family	Sustainability	
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Version control log

Date	Version No	Summary of changes	Reviewed by (SLT lead)
Sep 2018	V2	- Guidelines section (pg21) added in section on peer-on-peer abuse - Procedures section (pg 27) inserted information regarding new ESFA requirement to report safeguarding concerns in relation to Apprenticeship provision - Within Designated Safeguarding Lead responsibilities included about Care leavers and transferring of safeguarding files - Procedures section (pg27) paragraph added for Host family responsibility - Guideline section (pg31) section added for teachers' responsibility on new reporting rules for FGM disclosures - Guideline section (pg31) section added for the responsibility of the Head of Information, Technology & Development	Head of Safeguarding
Sep 2019	V3	- Work Placement updated to Work Related Activity (pg 5) - Sheffield Safeguarding Children's Board amended to Sheffield Children's Safeguarding Partnership - Section added on multi-agency working to reflect new safeguarding partner arrangements in line with Keeping Children Safe in Education guidance (pg 14) - Reference to up skirting added In line with Keeping Children Safe in Education guidance (pg 21) - New paragraphs included on serious violence in line with Keeping Children Safe in Education guidance (pg 21) - Section added on visible ID in college (pg 26) - Inclusion of action to take in the event of a student death added under responsibilities for Assistant Principal Student Experience and Employees	Head of Safeguarding
Sep 2020	V4	- Line added to definitions on mental and physical health in line with Keeping Children Safe in Education guidance (pg4) - Link to Covid Addendum included in related document section (pg7) - Link added NPCC "When to call the police" (pg9)	Head of Safeguarding

		• Paragraph added to reflect changes in safeguarding partner arrangements and information sharing (pg14) • New paragraph included on serious violence, gang involvement and county lines advice (pg21) • New paragraph added to provide staff with information about child criminal exploitation and child sexual exploitation (pg22) • Reword Honour based violence to Honour based abuse (pg22) • New paragraph on mental health to help staff make the link between mental health concerns and safeguarding issues and signpost guidance (pg23) • Paragraph included for E-safety (pg23) • Further clarification on GDPR included (pg28) • Reference to supply staff included in allegations against staff in line with Keeping Children Safe in Education (pg28)	
Aug 2021	V5	• Updated job titles throughout the policy • New link added to the updated Positive Behavior Policy to include cyberbullying (pg8) Organisational Responsibilities – sections included for Heads of Student Experience (HoSE) and Tutorial Mentors (TMs) (pgs 12&13) • Paragraph added to Multi Agency working around information sharing (pg 15) • Sexual abuse section now includes Sexual abuse online (pg 20) • Section to include online abuse included under Peer-on-Peer abuse (pg 22) • Section updated to include abuse in intimate relationships (pg 22) • Definition of Sexting updated (Pg 25) • Paragraph added Early Help Process section to include other factors that may indicate that a student may benefit. (pg 25)	Head of Safeguarding
Aug 2022	V6	• Updated job titles throughout the policy. • The word LAC has been changed to CLA throughout the policy. • New link added to KCSIE 2022 • New link added to Children Act 2004 as an addition to Children Act 1989. • New link added to UK Marriage and Civil Partnerships Act 2022. • Added IT risk assessment and action plan into supported/related documents (pg 8).	Head of Safeguarding

		• Added information added on how the policy is tested for effectiveness (pg 9). • Safeguarding Executive Group definition changed to incorporate the role of Executive Director People and for use during significant allegations against staff only (pg 17). • Reference made to safeguarding training being available at team meetings and regular reinforcement for staff (pg 17) • Information added regarding reporting significant abuse from employees/volunteers to external agencies (pg 17). • Safer Recruitment and selection section now contains the requirement to have an application form alongside a Curriculum Vitae (pg 18). • Safer Recruitment and Selection section now contains a paragraph on use of online checks when carrying out due diligence for shortlisted candidates (pg 18). • Included a paragraph regarding Searching, Screening and Confiscation (pg 21) • Paragraph added including the definition of Grooming, including its characteristics (pg 22). • Section updated to include the additional vulnerabilities of LGBTQ+ children/young people (pg 23). • Definition of Domestic Violence updated to Domestic Abuse and the experience of children as witnesses (pg 24). • Reference adding regarding the UK Marriage and Civil Partnerships Act 2022 in relation to Forced Marriage (pg 25). • Section updated with information on children not recognising their abuse or not wanting to/not knowing how to report abuse (pg 28). • Section updated to recognise that there are learning opportunities for all allegations against staff (pg 29).	
Aug 2023	V7	• Changed Deputy Chief Executive and Deputy Principal to Deputy Principal (throughout). • Changed Head of Safeguarding & EDI to Head of Safeguarding and Student Wellbeing (throughout). • Added link to KCSIE 2023 to linked documents (pg. 9). • Director of Student Services role added (pg.14).	Head of Safeguarding & EDI

		• Head of Learner Recruitment replaced with Director of Learner Recruitment, Marketing & Comms (pg. 17). • Added sentence regarding online checks (pg. 21). • Sentence added in regarding staff needing to have training on Filtering and Monitoring requirements in educational establishments (pg. 20). • Added sentence explaining Private Fostering, as required under the Principal's Audit criteria. (pg. 32).	
Sep 2024	V8	• Definition of safeguarding updated to reflect Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2023 (pg.7) • Changed "Vulnerable Adults" to "Adults with Care and Support Needs" to reflect current local jargon and practice (pg.8) • Keeping Children Safe in Education 2024 added as linked guidance (pg.10) • Working Together to Safeguard Children 2023 added as linked guidance (pg.10) • Safeguarding Vulnerable Groups Act 2006 added as linked guidance (pg.10) • Added reference to Link Safeguarding Governor (pg.11) • Change reference to ESFA to DfE (pg.12) • Added responsibilities for new role of Lead Designated Safeguarding Practitioner (pg.14) • Updated definitions of Extremism, Terrorism and Radicalisation added to reflect Keeping Children Safe in Education (2024) and Prevent Duty Guidance 2023 (pg.31) • Updated definition of children who may benefit from Early Help to reflect Keeping Children Safe in Education 2024 (pg.34&35) • Sentence added regarding safeguarding responsibilities with regards to students who are studying at College as part of Alternative Provision, to reflect Keeping Children Safe in Education 2024 guidance (pg.37)	Head of Safeguarding & Student Wellbeing
September 2025	V9	• Keeping Children Safe in Education link updated to 2025 version (pg. 10) • Responsibilities of Designated CLA Teacher added to Lead Designated Safeguarding Practitioner's responsibilities (pg. 14)	Head of Safeguarding & Student Wellbeing

		• Female Genital Mutilation definition updated to include that it is also illegal for a person to be taken to another country for the act to be carried out (pg. 19) • Multi-agency working definition updated to reflect Working Together statutory guidance (i.e. Lead Safeguarding Partners and education being part of strategic discussions) (pg 20-21) • Definitions of Conduct, Contact and Commerce for Online Safety updated in line with Keeping Children Safe in Education 2025 (pg. 33) • MyConcern changed to generic wording 'relevant recording database' (throughout document)	
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1. Policy Statement

The Sheffield College places the highest importance on safeguarding, and the safety and well-being of students is paramount in all college activities. Furthermore, the college recognises that employees/volunteers and students have an important role to play in safeguarding, in particular the welfare of young people and vulnerable persons and preventing abuse and/or harm. The Sheffield College also acknowledges that at any time any person could be classed as 'vulnerable'.

The college has a statutory duty placed on it by Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023) to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of young people and vulnerable persons. The Education Act 2011 further supports this, and the Children Act 1989 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate). To comply with this duty of care, all employees/volunteers must be aware of the lines of communication and levels of responsibility, which exist to ensure that matters of safeguarding, can be dealt with adequately.

The Safeguarding Procedure sets out a framework for those arrangements.

The college is not an investigating agency. Social Care and Health, or other agencies with statutory powers, i.e. the Police, as set out in the Sheffield Children's Safeguarding Partnership or Sheffield Safeguarding Adults Policy & Procedure, will normally carry out this function.

2. Definitions

Safeguarding – the action we take to promote the welfare of young and vulnerable people and protect them from harm by:

- protecting them from maltreatment whether that is in the home, community or online;
- preventing impairment of children's mental and physical health or development;
- preventing impairment of their health or development;
- ensuring that they grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all to have the best outcomes
- providing help and support to meet the needs of children as soon as problems emerge.

Regulated activity of children is any unsupervised activity (i.e. teach, train, instruct, care for or supervise, or advise on well-being, drive (only for children) which takes place in specified places (i.e. schools, childcare premises, and FE Colleges mainly educating children full-time). Regular means by the same person frequently (once a week or more often) or on more than three in a 30-day period (or in some cases, overnight).

Regulated activity for vulnerable groups is anyone undertaking personal care (i.e. assistance with washing and dressing, eating, drinking and toileting, or teaching someone to do one of these tasks). There is no requirement to undertake an activity several times before a person is in regulated activity.

3. Principles

This policy and procedure are based upon the principle of having simple, easy to follow processes that empower people to make disclosures, which are dealt with in a structured, professional manner.

4. Scope and Limitations

Young people under the age of 18.

Adults with Care and Support Needs (defined by Section 59, Safeguarding Vulnerable Groups Act 2006) is a person who has attained the age of 18 to whom one or more of the following applies:

- living in residential care such as a care/nursing home or a residential special school
- living in sheltered accommodation
- receiving domiciliary care in their own home
- receiving any form of health care
- detained in custody or under the supervision of the probation services
- receiving a specified welfare service, namely the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so
- receiving a service or participating in an activity for people who have specific needs because of their age or who have any form of disability
- an expectant or nursing mother living in residential care
- receiving direct payments from a local authority or health and social care trust in lieu of social care services, or
- requiring assistance in the conduct of their affairs.

5. Responsibilities

The Chief Executive & Principal has overall accountability for safeguarding within the college.

The Deputy Principal is the college's Executive Designated Safeguarding Lead.

The Vice Principal Student Experience is the college's Designated Safeguarding Lead and is responsible for development and overseeing the implementation of the arrangements covered in this policy.

The Head of Safeguarding and Student Wellbeing is the college's Deputy Designated Safeguarding Lead and working alongside the Designated Safeguarding Practitioner(s) is responsible for the communication and delivery of the safeguarding procedures.

Students who take part in offsite activities will have a health and safety check performed in advance to ensure students' safety. The accountability for this is as below:

Apprenticeship Placements: Joint accountability between the Head of Health, Safety, and Business Continuity the appropriate Sector Director Apprenticeships or Vice Principal Apprenticeships in the absence of the appropriate Sector Director.

Work Placements (Industry Placement, Mandatory Placement or Industry Taster): Joint accountability Head of Health, Safety and Business Continuity and Head of Student Experience within the Academy.

6. Implementation Arrangements

The roles and responsibilities of employees in implementing the policy and procedures are set out clearly in the guidelines.

All new employees are made aware of the policy and procedures during the formal employee induction process. Updated and amended procedures are disseminated and reinforced in training sessions, team meetings and via email communications. Employees and students have access to this policy on the college intranet.

7. Monitoring and Review

The Safeguarding Strategic Board will monitor the effectiveness of safeguarding policies and procedures implemented within the college, to ensure legal compliance. To facilitate this, Assistant Principals and Vice Principals are responsible for on-going monitoring in their areas of responsibility.

In addition to oversight by the Strategic Safeguarding Board, the policy is regularly tested through monitoring performance at Teaching, Learning, Quality and Student Experience Committee (TLQSE) meetings, any Serious Case Reviews and monitoring job descriptions in relation to roles and responsibilities. It is also externally reviewed through submission to Safeguarding Sheffield Children Board for scrutiny alongside the Principal's Annual Safeguarding Audit.

The Safeguarding Policy and Procedures are subject to an annual review unless there are changes in legislation or management arrangements. This review will consider the views of employees and students and relevant local and national documents. The college reserves the right to make whatever changes it deems appropriate. An updated copy of the policy and procedures is available.

8. Supporting/Related Documents

This policy does not stand-alone and should be used in conjunction with other College policies and procedures.

- Admissions Policy
- DBS & Safer Recruitment Policy
- Educational Visits Policy
- Employee Disciplinary Policy
- Employee Harassment Policy
- Employee Code of Conduct
- Equality Scheme
- Health, Safety & Welfare at Work Policy
- Health & Safety Risk Assessment Policy
- Health & Safety Vetting for WBL & Work Experience, including Projects Policy
- Nursery Safeguarding Policy
- Whistleblowing Policy

The following related policy, procedure and information can be found [here](#)

- Criminal Conviction procedures
- E Safety Policy
- External events and visiting speaker risk assessment
- Fitness to Study Policy
- Fundraising procedures
- IT Risk Assessment and Action Plan 2022 - 2025
- Prevent Risk Assessment and Action Plan 2022 – 2025
- Safeguarding services in Sheffield
- Searching, Screening and Confiscation Policy
- Sexual Abuse and Harassment; Guidelines for Staff
- Student Positive Engagement and Behaviour Policy

In addition, the following legislative documents are linked below;

- [Children Act 1989](#)
- [Children Act 2004](#)
- [Education Act 2011](#)
- [Keeping Children Safe in Education 2025](#)
- [Working Together to Safeguard Children 2023](#)
- [Safeguarding Vulnerable Groups Act 2006](#)

9. Guidelines

9.1 ORGANISATIONAL RESPONSIBILITIES FOR SAFEGUARDING

Governance

One Governor from the Teaching, Learning, Quality and Student Experience (TLQSE) acts as the College's Link Safeguarding Governor, providing additional scrutiny of safeguarding procedures and attending Safeguarding Strategic Board. However, each member of the Governing Body has an individual role in providing leadership and ensuring that all decisions reflect the intentions outlined in the Safeguarding Policy. To be equipped to fulfill this role, each governor will receive appropriate safeguarding and child protection training.

Chief Executive and Principal

The Chief Executive and Principal has overall responsibility for all matters, including those involving safeguarding. This responsibility includes ensuring that safeguarding is addressed through comprehensive policies and procedures that are effectively implemented and appropriately resourced within the overall financial position of the college.

The **Deputy Principal** who is the college's Executive nominated Designated Safeguarding Lead assists the Chief Executive and Principal.

The **Vice Principal Student Experience** is the Designated Safeguarding Lead and has responsibility for ensuring that the aims and objectives of the college's Safeguarding Policy are implemented.

Chair of the Safeguarding Strategy Board

The Deputy Principal will chair The Sheffield College Safeguarding Strategic Board to oversee the implementation of this Policy.

The Chair will:

- ensure that the college has a policy and procedures on Safeguarding, which are in accordance with statutory requirements and local authority guidance
- ensure that communication systems are in place to enable the policy and procedures to be brought to the attention of all employees/volunteers
- ensure that the objectives of the Policy are fully understood, implemented, and supported by the College Leadership Team and Executive Leadership Team
- ensure that rigorous monitoring procedures are in place at all levels of the organisation to facilitate the effective implementation of the Policy
- ensure that the Policy is reviewed regularly by the Safeguarding Board for approval by the Executive Leadership Team and Governing Body
- ensure that an Annual Report and Action Plan of priorities are drawn-up by the college's Safeguarding Board for approval by the Executive Team and Governing Body

- in the absence of the Deputy Principal, Chair will be delegated to the Vice Principal Student Experience

Academy Leadership Team

Each member of the Academy Leadership Team is responsible for ensuring that the college Safeguarding Policy is implemented. They will also:

- have responsibility for all matters of safeguarding within their areas of responsibility
- be individually responsible for ensuring the introduction of agreed college initiatives, which will facilitate the implementation of the college Safeguarding Policy and Procedure in full.

Vice Principal Student Experience (as Designated Safeguarding Lead)

The Vice Principal Student Experience is the Designated Safeguarding Lead for The Sheffield College and has lead responsibility for:

- dealing with child protection and vulnerable person issues
- providing advice and support on all matters relating to safeguarding
- overseeing the successful implementation of the Policy and Procedures
- liaising with external agencies, where appropriate, on any disclosures received
- ensuring that there is a robust network of Safeguarding Officers across the college who are appropriately trained
- taking a lead role in liaising and working with Local Safeguarding Children Boards, Safeguarding Adults Boards and other agencies as required
- ensuring that the college operates safer recruitment practices in accordance with statutory requirements and in conjunction with the Executive Director of People
- attending training commensurate with the role, including updated child protection training every two years
- attending, when necessary, case strategy meetings with the designated officer from the relevant local authority in respect of safeguarding issues, and in liaison with the Executive Designated Safeguarding Lead
- ensuring an Annual Report is produced and presented to the Governing Body
- ensuring that the college has appropriate resources available for safeguarding,
- in liaison with the Executive Director of People ensure that Risk Assessments are undertaken following any employee's disclosures in relation to Disqualification by Association
- ensuring that the DfE have been contacted if the college or one of its subcontractors is subject to investigation by the local authority or the police
- ensuring that systems are in place for the safe and secure transfer and receipt of confidential safeguarding files, in accordance with relevant local authority requirements
- ensuring college protocols are followed following the death of a student
- implementing the NPCC guide on when to call the police [When to call the police](#).

They are also the nominated college Prevent lead and are responsible for:

- updating the college Safeguarding Board on progress on Prevent and any other relevant areas
- attending The Sheffield Prevent Steering Group and reporting into the college for action to be taken as appropriate
- leading on the college Prevent Action Plan liaison with external agencies as appropriate.

Head of Safeguarding & Student Wellbeing

The Head of Safeguarding and Student Wellbeing is the college's nominated deputy for strategic safeguarding matters and will attend training commensurate with this role. The Head of Safeguarding and Student Wellbeing will:

- co-ordinate and monitor the arrangements for safeguarding throughout the college, including access to and the provision of Designated Safeguarding Practitioners across the college
- undertake training to provide them with the knowledge and skills required to carry out the role, which should be updated at least every two years
- use appropriate media to circulate information to all relevant employees/volunteers/students of the college on matters relating to safeguarding
- produce an Annual Report to present to the college Safeguarding Board
- attend sub-committees, working groups both internally and externally, where appropriate
- contribute to the development and production of policies and procedures, in accordance with current Legislation, Regional and National Policy
- in conjunction with Academy Leadership Teams, be responsible for the monitoring of safeguarding issues throughout the college, ensuring that effective strategies and monitoring regimes are introduced where necessary
- support with the production of risk assessments, taking on board the needs of vulnerable people, with the aim of developing a positive safety culture within the college
- ensure that systems are in place for the recording and monitoring of safeguarding disclosures to undertake statistical analysis, to inform the safeguarding training strategy for the college
- ensure there is a Designated Person for Children, Looked After and ensure that systems are in place for recording and supporting these young people
- act as the college's Child Criminal and Child Sexual Exploitation Champion

Lead Designated Safeguarding Practitioner

The Lead Designated Safeguarding Practitioner is the college's nominated Deputy for operational safeguarding matters, specifically supporting Bloom students (and as such therefore has all the responsibilities that a Designated Safeguarding Practitioner would have). In addition, they are also responsible for:

- monitoring the arrangements for safeguarding, ensuring appropriate access to Designated Safeguarding Practitioners
- conducting work around the Children, Looked After Cohort and acting as the college's Designated CLA Teacher
- As the Designated CLA Teacher, the Lead Designated Safeguarding Practitioner is responsible for promoting the educational achievement of children who are looked after. This includes those under Kinship Care Orders, as well as any who have left care through adoption, special guardianship or child arrangement orders, or who were adopted from state care outside England and Wales.
- develop and deliver training for Designated Safeguarding Practitioners, including new starter inductions
- support with complex matters cross-college, offering advice on risk assessments, safety planning and supporting the Designated Safeguarding Practitioners in the course of their work
- ensuring that Designated Safeguarding Practitioners, and themselves, remain up to date with appropriate training and providing guidance on safeguarding training that may benefit the Safeguarding Team and wider staffing teams in college
- monitor the implementation of college wide policies and procedures relating to Safeguarding and advise the Head of Safeguarding & Student Wellbeing on improvements or amendments to such policies.

Assistant Principals & Vice Principals

Individual members of the college's Leadership Team are responsible for the welfare of employees and students whom they supervise and manage, and all users of those workplaces, which they control. They must maintain close liaison with their employees in safeguarding matters and they are responsible for the following:

- ensuring the implementation of any safeguarding policies or procedures approved by the college within their own area and that they are brought to the attention of, and made available to, employees, volunteers, students, contractors and visitors within the area
- ensuring employees' attendance at mandatory training
- ensuring that suitably and sufficiently trained persons are identified and available within their areas of responsibility to support the application of safeguarding legislation and college policies/procedures
- ensuring that individual Job Descriptions and Person Specifications clearly define the role, the tasks and skills needed to reflect the level of responsibility in relation to safeguarding
- ensuring that Safer Recruitment practices are applied when recruiting to posts

- ensuring that the services within their control provide a healthy and safe environment, whilst taking on board different cultural aspects of the college and local community
- ensuring that contractors/subcontractors working on college premises comply with the safeguarding regulations, which will be made available and clear to them when they tender for work. They must conform to the college's safeguarding standards, which will include the employment of competently trained personnel and ensuring that they meet their statutory obligations
- ensuring that there are processes in place in their areas of responsibility for the checking of DBS Certificates (in line with college requirements) in respect of external agencies supporting students whilst on college premises or undertaking off-site college activities
- ensuring that an external events and visiting speakers' risk assessment is completed for all events in a timely fashion in order that they can be approved prior to the event taking place. (It is the responsibility of the Head of Student Experience with responsibility for the area in which the event is taking place to approve the event and all completed risk assessments should be forwarded to the Head of Safeguarding for inputting onto the college's database)

Academy Directors

Academy Directors are responsible for:

- ensuring all new employees/students/contractors/volunteers receive an induction with their line manager, emphasising the safeguarding aspect of their duties
- implementing, departmental policies, procedures, and assessments in line with overall college policies and procedures
- implementing safeguarding training (including refresher training) for employees identified within the Appraisal process
- monitoring employees' attendance at agreed training sessions
- ensuring that risk assessments are undertaken for all vulnerable persons within their area, and that employees conducting these risk assessments are suitably trained in the process, and can use action plans that result from risk assessments
- ensuring appropriate documentation of such risk assessments is kept securely
- implementing, coordinating, and maintaining the vetting of all employer premises for all Industry and Work placements in line with college policy and procedures to ensure that a safe and secure environment is established in all aspects of the work placement
- co-ordinating work placement information, for Industry and Work placements, into a central college database, which is maintained as a record for all Employer Health, Safety and Environment workplace assessments
- carrying out risk assessments for their respective areas where students declare a criminal conviction, ensuring the student is informed fully of the outcome.

Director of Student Services

The Director of Student Services is responsible for:

- ensuring that all new employees under their remit receives an induction which emphasises their safeguarding responsibilities.
- ensuring that any safeguarding concerns regarding International Students are reported to the UKVI as appropriate.
- ensuring that Safeguarding Requirements for the Turing Scheme are met for each individual trip.

Heads of Student Experience (Or other designated member of the Academy Leadership Team)

Heads of Student Experience are responsible for:

- completing the External Events and Visiting Speakers' risk assessment for all events. (All completed risk assessments should be forwarded to the Head of Safeguarding)
- completing the fundraising risk assessment for any activity taking place within their areas of responsibility. (All completed risk assessments should be forwarded to the Head of Safeguarding)
- implementing effective communications on safeguarding throughout the faculty
- undertake DSL training to provide them with the knowledge and skills required to carry out the role, which should be updated at least every two years
- providing advice and support to other employees/volunteers on issues related to young people and vulnerable persons
- monitoring the progress of students in their faculty, including CLA and/or those with a safeguarding disclosure and, in liaison with Designated Safeguarding Practitioners, Personal Tutors and Student Mentors, or their equivalent, overseeing the implementation of support strategies.

Personal Tutors

Personal Tutors are responsible for:

- supporting all students with pastoral needs and initial safeguarding and well-being concerns within their cohort
- attending student progress meetings, where appropriate, and supporting the implementation of agreed support strategies for students in their cohort
- liaising with parents/carers where appropriate in line with the college's Disclosure to Parents/carers Procedure. (Following consultation with the college's Designated Safeguarding Lead, or nominated Deputy, as required)
- attending training commensurate with the role.

Student Mentors

Student Mentors are responsible for:

- the timely completion of personal education plans for Children, Looked After (CLA)

- providing initial safeguarding support, recording disclosures and sharing information appropriately
- providing support for students regarding their mental health and well-being
- liaising with Designated Safeguarding Practitioners, ensuring that appropriate support is wrapped around any student at serious risk of harm
- attending student progress meetings and supporting the implementation of agreed support strategies for students in their cohort
- attending training commensurate with the role.

Sector Directors (Apprenticeships)

As well as the above Sector Directors (Apprenticeships) are responsible for:

- implementing, coordinating, and maintaining the vetting of all employer premises for all work-based learning in line with college policy and procedures in order to ensure that a safe and secure environment is established in all aspects of the apprenticeship work placement
- coordinating work placement information, relating to apprenticeships, into a central college database, which is maintained as a record for all Employer Health, Safety and Environment workplace assessments
- liaising with relevant areas to ensure appropriate vetting visits are completed.
- preparing operational reports as requested.

Designated Safeguarding Practitioners

Designated Safeguarding Practitioners are responsible for:

- receiving, recording and passing onto external agencies, where appropriate and following consultation with the Deputy Designated Safeguarding Lead, disclosures in accordance with college procedures
- leading student progress meetings and supporting the implementation of agreed support strategies for CLA and/or students with safeguarding disclosure, in liaison with Student Mentors and Personal Tutors where appropriate.
- liaising with the Deputy Safeguarding Lead as appropriate
- providing advice and support to other employees/volunteers on issues related to young people and vulnerable persons
- liaising with parents/carers where appropriate in line with the college's Disclosure to Parents/carers Procedure. (Following consultation with the college's Designated Safeguarding Lead, or nominated Deputy, as required)
- attending training commensurate with the role
- keeping themselves up to date with any changes in college policy/procedures or legislative change.

Executive Director People

The Executive Director of People is responsible for:

- ensuring that the employment of people within the college fulfils the requirements of Safer Recruitment
- ensuring that there is a system in place for maintaining and monitoring the college's Single Central Record
- ensuring that risk assessments are undertaken following any DBS Certificate disclosures
- leading on allegations against staff and implementing the Executive Safeguarding Group where appropriate.

Estates Management Team

The Estates Management Team are responsible for:

- ensuring that all contractors satisfy safeguarding requirements under their statutory obligations and provide information to contractor employees
- liaising with the Executive Designated Safeguarding Lead or nominated Deputy on all issues related to safeguarding the welfare of young persons and vulnerable persons.

Senior Procurement Officer

The Procurement Officer is responsible for:

- ensuring that all procurement documents detail the requirements for safeguarding
- ensuring that all contractors on the college's Approved Contractor List fulfil their contractual obligations in so far as they relate to safeguarding.

Director of Marketing, Communications & Learner Recruitment

The Director of Marketing, Communications & Learner Recruitment or their nominated deputies will ensure that:

- they liaise with Academy Heads for risk assessments to be undertaken in line with any criminal conviction disclosures received through the student / apprentice application process.
- ensure that processes that safeguard our students and apprentices are effective when using case studies, including photos for publicity purposes.

Teachers

Female Genital Mutilation

Within the United Kingdom this practice is prohibited and, therefore, a criminal offence if carried out in the UK, or if a person is taken to any country abroad from the UK in order to carry out the act. Any disclosures of this type should automatically be referred to the Designated Safeguarding Lead or their nominated deputy; however, the member of staff who discovers this is required to report it directly to the police.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Director of Information Technology and Digital Transformation

The Director of Information Technology and Digital Transformation is responsible for:

- ensuring that appropriate systems are in place to monitor IT login domains
- monitor and report attempts to access controlled websites in line with the Prevent Agenda
- being the college link for external agencies if any IT data is requested.

Workers and Volunteers

All workers and volunteers have a responsibility to co-operate fully with the college's policies and procedures to ensure that the college, as their employer, can carry out its responsibilities.

All worker and volunteers have a legal duty of care to others. Regardless of the position held within the college, they must:

- inform the Deputy Designated Safeguarding Lead of any student that has disclosed to them that they are being supported by an external agency (ies), e.g. Child & Adolescent Mental Health Services (CAMHS)
- ensure personal safeguarding training needs are identified within the Go Further process.
- take responsibility for attending agreed training sessions
- report any safeguarding concerns in accordance with college procedures
- participate in training sessions about safeguarding as requested
- be aware of and participate in the risk assessment process
- if requested, supervise an individual who does not have relevant DBS/safeguarding requirements in place
- disclose to The People Experience Team any change in circumstances which impacts on their ability to work with children and/or vulnerable persons in the course of their employment and in line with their Contract of Employment
- immediately inform the DSL/DDSL in the event of a student death.

Nursery

The Senior Nursery Manager is the Nominated Person for the Nursery and has day-to-day responsibility for child protection issues within the Nursery, which is subject to a separate policy and procedures. The Nominated Person will liaise with the nominated Deputies as appropriate.

Multi-agency working

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance. It is especially important that schools and colleges understand their role in the new safeguarding partner arrangements.

New Safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) will plan to work together with appropriate relevant agencies to safeguard and promote the welfare of local children. Each safeguarding partner will have a Lead Safeguarding Partner identified, this role will have responsibility for accountability of their service, decision-making and meeting statutory duties of their agency.

It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. The college's Governing Body, Senior Leadership Team and designated safeguarding leads, have made themselves aware of and follow their local arrangements. It is recommended through the Working Together to Safeguard Children guidance that safeguarding partners involve education settings in strategic discussions. It is also expected that any education setting, working with children up to the age of 18, are involved in local arrangements.

Staff should not assume a colleague, or another professional would take action and share information, which might be critical in keeping children safe. If in doubt about sharing information staff must speak to the Designated Safeguarding Lead or Deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

9.2 ORGANISATIONAL ARRANGEMENT STRUCTURE TO FACILITATE SAFEGUARDING

Governing Body

Whilst the Chief Executive and Principal carries and accepts overall responsibility, the Governing Body is responsible for the endorsement, approval, and implementation of the college's safeguarding policies.

College – Safeguarding Strategic Board

The key function of the board is to establish and maintain a safe learning environment, by developing, approving, and monitoring college safeguarding policies and procedures, and working on an annual action plan.

The board aims to promote a culture of understanding and co-operation across the college to ensure the safety and welfare of all employees, volunteers, students, contractors, subcontractors, and visitors.

Working Groups may be convened in response to specific issues, with key aims and objectives being set. These Groups will report directly to the Safeguarding Board.

The Deputy Principal is Chair of the Board, Terms of Reference for the college Safeguarding Board are established.

Safeguarding Executive Group

The Executive Director People will refer significant allegations of abuse made against employees/volunteers to the Safeguarding Executive Group, which is responsible for responding quickly and appropriately to such allegations.

The Safeguarding Executive Group will be convened by the Executive Director People and comprise of some, or all, the following roles as deemed appropriate:

- Chief Executive and Principal
- Executive Designated Safeguarding Lead
- Designated Safeguarding Lead
- Deputy Designated Safeguarding Lead
- Executive Director of People

The Executive Director People will consider and, where appropriate, include the Safeguarding Link from the Governing Body.

Where the Safeguarding Executive Group has met in relation to a significant allegation of abuse against employees/volunteers, referrals will be made to the Local Authority Designated Officer. Their advice will then be followed regarding further referral to relevant external bodies such as: Disclosure and Barring Service, the Police and Social Care. (This list is not exhaustive).

Training and Information

The training of Governors, all employees, volunteers, and students is an essential element of having successful safeguarding arrangements in place.

The information, instruction and training of all people is seen as a fundamental part of providing a safe learning environment. Training for employees/volunteers should be provided at the start of employment (induction) and then on a regular basis throughout employment. Training will include raising awareness among staff on the expectations, key roles, and responsibilities in relation to Filtering and Monitoring for e-safety.

Safeguarding training is regularly embedded via team meetings. Line managers ensure the participation of appropriate staff in both internal and external safeguarding training. The monitoring of the annually updated and approved Safeguarding Training Matrix ensures that regular safeguarding training is also available internally during development days for new and existing staff.

This continual training programme is to ensure high standards are maintained for the benefit of employees, volunteers, students, and the public.

Further training will be delivered to individuals commensurate with their roles and responsibilities with the college.

All training provided should be recorded and evidence kept that training has taken place.

Safer Recruitment and Selection

The Executive Director of People is responsible for ensuring that the college has systems in place which pay full regard to the guidance set out in "Keeping children safe in education" and "Working together to safeguard children".

The college's Recruitment & Selection Policy and supporting procedures ensure that all appropriate measures are applied in relation to everyone who works at the college, including Governors, employees, volunteers, and persons employed by external contractors/partners, including:

- requiring an application form, rather than solely a Curriculum Vitae
- completing appropriate online checks on shortlisted candidates and informing the candidates that these will take place as good practice
- verifying identity and academic or vocational qualifications (where appropriate)
- obtaining professional and character references and checking previous employment histories
- in preparation for interviews, completing online searches when undertaking due diligence checks on shortlisted candidates where appropriate
- obtaining relevant Disclosure & Barring disclosures for employees in line with their role and responsibilities in the College and in accordance with Government guidance
- undertaking risk assessments, as appropriate, following information received from DBS
- applying additional checks to all new employees who are non-European Economic Area (EEA) nationals
- keeping a single central record detailing the range of checks carried out on employees
- in the case of temporary/agency employees operating on college premises, requiring them to agree to and abide by safeguarding conditions set out by the college.

Disclosure and Barring Service – Statement on the Secure Storage Handling, Use, Retention and Disposal of Disclosures and Disclosure Information

General Principles

As an organisation using the Disclosure & Barring Service (DBS) to help assess the suitability of applicants for positions of trust, the college complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the General Data Protection Regulations and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and Access

Disclosure information should be kept securely in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with Section 124 of the Police Act disclosure information is only passed to those who are authorised to receive it in the course of their duties. The college maintains a record of all those to whom disclosures or disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention and Disposal

Once a recruitment (or other relevant) decision has been made, the college does not keep disclosure information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months the college will consult the DBS about this and will consider the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Once the retention period has elapsed, the college will ensure that any disclosure information is immediately destroyed by secure means, e.g. by shredding, pulping or burning. While awaiting destruction disclosure information will not be kept in any insecure receptacle, e.g. waste bin or confidential waste sack. The college will not keep any photocopy or other image of the disclosure or any copy of representation of the contents of a disclosure. However, notwithstanding the above, the college may keep a record of the date of issue of a disclosure,

the name of the subject, the type of disclosure requested, and the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

9.3 EVENTS AND EXTERNAL SPEAKERS (PREVENT DUTY)

To comply with the Counter Terrorism and Security Act 2015 which imposes a duty on Further Education Colleges to have due regard to the need to prevent people from being drawn into terrorism, the college makes an assessment of risk for all external events and visiting speakers. A risk assessment is completed by any employee who is responsible for organising external events. This includes events organised outside of normal college hours. When deciding whether to host a particular speaker or event, the college will consider carefully whether the views being expressed or likely to be expressed constitute extremist views that risk drawing someone into terrorism or are shared by a terrorist group. In these circumstances, the event will not be allowed to proceed except where the college is entirely convinced that such risk can be fully mitigated without cancellation of the event.

This includes ensuring that, where an event is being allowed to proceed, speakers with extremist views that could draw people into terrorism are challenged and opposing views as part of that same event, rather than in a separate forum. Where there is any doubt that the risk cannot be mitigated the event will not be able to proceed.

9.4 RECRUITMENT OF EX-OFFENDERS

The Rehabilitation of Offenders Act enables criminal convictions to become 'spent' or ignored after a 'rehabilitation period'.

Under the Criminal Justice and Court Service Act, however, it remains an offence, punishable by imprisonment for anyone either convicted of or cautioned for a Schedule Four offence to apply to work with children, young people or vulnerable persons. It is also an offence for anyone knowingly to employ such a person in such a capacity either on a paid or voluntary basis.

It is a requirement of the DBS's Code of Practice that all Registered Bodies must treat disclosure applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed.

It also obliges Registered Bodies to have a written policy on the recruitment of ex-offenders. (A copy of which can be given to disclosure applicants at the outset of the recruitment process.)

Recruitment of Ex-offenders Procedure

The following has been developed to help the college meet the requirements of the DBS's Code of Practice.

- as an organisation using the Disclosure & Barring Service to assess applicants' suitability for positions where employees or potential employees will care for, train, supervise or are in sole charge of children, young or vulnerable persons. The college complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a disclosure based on a conviction or other information revealed
- the college is committed to the fair treatment of its employees, potential employees, or users of its services, regardless of gender, race, nationality, ethnic or national origins, marital status, sexual orientation, political or religious beliefs and activities, family responsibilities, class, physical, sensory, mental or other forms of disability or medical condition
- the college actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records. The college selects all candidates for interview based on their skills, qualifications and experience
- for those positions where a disclosure is required, job adverts and recruitment briefs will contain a statement that a disclosure will be requested in the event of the individual being offered a position
- where a disclosure is to form part of the recruitment process and in line with legislative requirements, the college encourages all applicants called for interview to provide details of their criminal record at an early stage in the application process. The college will request that this information is given in person to a designated person in the People Operations department of The Sheffield College and the college guarantees that this information will only be seen by those who need to see it as part of the recruitment process
- failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- the college ensures that all those in the college who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. The college also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex- offenders, e.g. the Rehabilitation of Offenders Act
- the college make every subject of a DBS disclosure aware of the existence of their Code of Practice and make a copy available on request
- at interview, or in a separate discussion, the college ensure that an open and measured discussion takes place about any offences or other matter that might be relevant. In certain circumstances it may be appropriate to conduct a confidential risk assessment with an individual where a disclosure reveals previous criminal convictions and/or Cautions. Where this takes place, the counter-signatory will make a record of the risk assessment and get the individual to sign it or confirm its accuracy by email. This is then forwarded to the Lead Counter-signatory for their approval
- this will then be kept on the employee's personal file in a sealed envelope. **Having a criminal record will not necessarily bar someone from working for The Sheffield College.** This will depend on the nature of the position and the circumstances and background of disclosed offences
- should an applicant wish to complain about information disclosed a Complaints Procedure is available directly from the DBS

- the college will co-operate with requests from the DBS to undertake assurance checks as to the proper use and safe keeping of disclosure information
- the college will also report to the DBS any suspected malpractice in relation to the Code of Practice or any suspected offences in relation to the misuse of disclosures
- as a Registered Body of the DBS, the Lead Signatory has provided appropriate training for all counter-signatories. This document will be under continual review considering changing legislation and guidelines from the DBS.

9.5 SEARCHING, SCREENING AND CONFISCATION

The Searching, Screening and Confiscation policy is linked into this document above. Staff are responsible for ensuring that they are familiar with the policy, its guidelines, and procedures. If a search is to be carried out, there must be reasonable grounds as outlined above and it must be carried out in line with the guidance provided.

9.6 CATEGORIES OF ABUSE

If you have concerns about a child or young person, you should refer them to a Safeguarding Officer for advice, support and external referral if required.

Physical Abuse

This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately includes illness in a young person.

Emotional Abuse

This is the persistent emotional ill-treatment of a young person such as to cause severe and persistent effects on the young person's emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectation being imposed on young people.

These may include interactions, which are beyond the young person's developmental capability as well as overprotection and limitation of exploration and learning or preventing the young person from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve bullying and causing young people to feel frightened or in danger, or the exploitation or corruption of young people.

Some level of emotional abuse is involved in all types of ill treatment of a young person, though it may occur alone.

Grooming

Grooming can be defined as the process that an abuser uses to befriend and establish an emotional connection with their victim. This is to lower the victim's inhibitions in terms of reporting abuse that they are experiencing. It is often used against victims of sexual abuse but is also evident in other forms of abuse such as: Domestic Abuse, Forced Marriage, Child Sexual/Criminal Exploitation. This list is not exhaustive however, and it is important to have due regard for potential grooming in any form of abuse. It should also be noted that Grooming can take place both online and offline. Grooming is characterised by the perpetrator establishing a good relationship with their victim and, sometimes, the victim's family. This is because a trusting relationship with a victim and their family will make it less likely that their activity is reported to authorities. They may do things such as: finding opportunistic time to spend with the victim, give the victim gifts or money or normalising their behaviour using online content.

Sexual Abuse

This involves forcing or enticing a young person to take part in sexual activities, including prostitution, exploitation whether the young person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving young people in looking at, or in the production of pornographic materials or watching sexual activities or encouraging young people to behave in sexually inappropriate ways. Sexual abuse can take place online and technology can be used to facilitate offline abuse

Neglect

This is the persistent failure to meet the young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter (including exclusion from home or abandonment), failure to protect a young person from physical and emotional harm or danger, failure to ensure adequate supervision, including the use of inadequate caretakers or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Vulnerable Persons

Physical Abuse

This includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

Sexual Abuse

This includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting to. Sexual abuse can

occur between people of the same sex and it can occur within a marriage or any long-term relationship. A relationship of trust and a duty of care should exist between an employee or a volunteer and the person for whom they are caring. It would be seen as a betrayal of trust and, therefore, abusive for that employee or volunteer to have a sexual relationship with the person they are caring for.

Psychological Abuse

This includes emotional abuse, bullying and threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial or Material Abuse

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

Neglect and Acts of Omission

This includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

Discriminatory Abuse

This includes abuse or harassment that is based on a person's protected characteristic. Staff should be aware that students with learning difficulties are amongst the more vulnerable in society, similarly staff should be aware that children within the LGBTQ+ community, or those perceived to be within this community, are also amongst the most vulnerable and maybe targeted by other children.

Other forms of abuse

Child on Child

Children and young people may be harmful to one another in a number of ways which would be classified as child-on-child abuse. There are many forms of child-on-child abuse, which should never be tolerated, passed off as 'banter' or 'part of growing up'.

Peer on Peer

Adults may be harmful to one another in a number of ways which would be classified as peer-on-peer abuse. There are many forms of peer-on-peer abuse, which should never be tolerated

Examples of such abuse include:

- Sexual violence and sexual harassment
- Physical abuse
- Sexting
- Initiation / Hazing type violence and rituals
- Up skirting - typically involves taking a picture under a person's clothing without their knowledge (this is now classed as a criminal offence)
- Technology is a significant component in many safeguarding and wellbeing issues. People are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life
- Abuse in intimate personal relationships between children and/or peers

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measure in place to manage these. Advice for schools and colleges is provided in the Home Office's "Preventing youth violence and gang involvement" and its "Criminal exploitation of children and vulnerable adults: county lines" guidance

Domestic Abuse

Domestic Abuse can encompass a wide range of behaviours. It can be a single incident or a pattern of incidents. It is generally abuse that takes place within an intimate relationship from one person to another. However, children can experience and be victims of Domestic Abuse either directly or through witnessing it within their familial home. Domestic Abuse can involve (but is not limited to) sexual abuse, physical abuse, emotional abuse, or financial abuse.

It can force a person to alter their behavior, because they are frightened of their partner's reaction, and this is a form of abuse.

There is no single cause of domestic violence. It comes from a combination of factors, including society's attitudes, community responses, and the individual psychological experiences of the abuser and the abused. Domestic Abuse is the result of an abuser's desire for power and control.

Children and young people may see, hear, or experience Domestic Abuse either in the community, at home or within their own intimate relationships (i.e., abusive teenage

relationships). All of this can have a detrimental long-term impact on their emotional wellbeing, health, development, and ability to learn.

If you have concerns about a child or young person, you should refer them to a Designated Safeguarding Practitioner for advice, support and external referral if required.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organized abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

If you have concerns about a child or young person, you should refer them to a Safeguarding Officer for advice, support and external referral if required.

Extremism and Radicalisation

A statutory duty has been placed on Further Educational establishments to have due regard to the need to prevent people from being drawn into terrorism, and to ensure that they are given appropriate advice and support. If you have any concerns about a student, hear, or see anything that concerns you, please contact a Designated Safeguarding Practitioner.

Children/adults with support and care needs, may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate.

Forced Marriage

A forced marriage is a marriage that is performed under duress and without the full and informed consent or free will of both parties and is a criminal offence in the UK.

The definition of Forced Marriage has also been expanded under the Marriage and Civil Partnerships Act 2022 to widen the existing criminal law. This now means that anyone arranging the marriage of a person under the age of 18 is committing an illegal act. The offence now applies to any religious or civil ceremony of marriage, regardless of whether it is legally binding. Victims of forced marriage may be the subject of physical violence, rape, abduction, false imprisonment, enslavement, emotional abuse, and murder. It is important not to confuse 'forced' marriage with 'arranged' marriage. In the instance of an 'arranged' marriage both parties freely consent. Any disclosures of this type should automatically be referred to the Designated Safeguarding Lead or their nominated deputy for external referral.

Honour Based Abuse

'Honour' based abuse (HBV) is a form of domestic abuse which is perpetrated in the name of so called 'Honour'. The honour code which it refers to is set at the discretion of male relatives and women who do not abide by the 'rules' are then punished for bringing shame on the family.

Infringements may include a woman having a boyfriend, rejecting a forced marriage; pregnancy outside of marriage; interfaith relationships; seeking divorce, inappropriate dress or make-up and even kissing in a public place.

HBA can exist in any culture or community where males are in position to establish and enforce women's conduct, examples include Turkish; Kurdish; Afghani; South Asian; African; Middle Eastern; South and Eastern European; Gypsy and the travelling community (this is not an exhaustive list).

Males can also be victims, sometimes because of a relationship which is deemed to be inappropriate, if they are gay, have a disability or if they have assisted a victim.

This is not a crime, which is perpetrated by men only, sometimes female relatives will support, incite, or assist. It is also not unusual for younger relatives to be selected to undertake the abuse to protect senior members of the family. Sometimes contract killers and bounty hunters will also be employed.

Any disclosures of this type should automatically be referred to the Designated Safeguarding Lead or their nominated deputy for external referral.

Mental Well-being

Positive mental health and emotional well-being describes how we think, feel, and relate to others and ourselves and how we interpret the world around us. Having good mental health

affects our capacity to manage, communicate, and form and sustain relationships. It also affects our ability to cope with change and major life events.

If a person has poor mental health this will affect how they interact with others, their ability to apply themselves to learning, attendance, behavior, etc. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy. The College owes a duty of care to young people and employees need to take appropriate action if they have concerns by referring them to, for example for Counselling.

Self-Neglect/Harm

This is not a direct form of abuse, but employees need to be aware of it in the general context of risk assessment and risk management, and to be aware that they may owe a duty of care to young people who place themselves at risk in this way.

E-safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to E-safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within E-safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content such as: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization, extremism, misinformation disinformation (including fake news) and conspiracy theories
- **contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for financial, sexual, criminal or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online or bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams. Any concerns regarding this can be referred to the Anti-phishing group (<https://apwg.org/>)

If you have any concerns about a student, hear, or see anything that concerns you, please contact a Safeguarding Officer.

Other safeguarding issues

Other safeguarding issues can include (this list is not exhaustive):

- Bullying, including cyberbullying
- Children missing from home or care
- Drugs
- Fabricated or induced illness
- Faith and gender-based abuse/violence
- Gangs and youth violence
- Hate crime
- Private fostering: if aware, educational establishments must inform the Local Authority where children (Under 16 or under 18 where the child is disabled) are living with an individual who they are not related to for more than 28 days in a row.
- Trafficking
- Modern Slavery

If a college employee has concerns in relation to any of the above, please contact a College Safeguarding Officer for further advice and support.

9.7 EARLY HELP PROCESS

The Early Help Assessment (EHA) is a standard shared assessment that can be used by all Sheffield City services working with children and young people and their families. The assessment is particularly useful for use in early intervention work, where the college works with families as soon as we realise that a child or young person may have emerging needs.

If a college employee, feels that a student that they are working with would benefit from an EHA they should contact a Safeguarding Officer in the first instance, who will implement the appropriate interventions.

The EHA should be used to help identify low level or emerging needs. The EHA consists of

- an EHA pre-assessment checklist and request for support form (previously known as the CAF pre-assessment checklist) to identify and document low-level needs or help decide if an EHA may be needed
- a process to enable practitioners to undertake an Early Help Assessment using a standard document and, where appropriate, form a Team Around the Family (TAF), action plan and review.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a multitude of reasons such as (this list is not exhaustive):

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

9. Procedure

10.1 DEALING WITH A DISCLOSURE OR A CONCERN

It is recognised that some children or vulnerable persons may not feel ready or know how to tell someone that they are being abused, exploited, or neglected or they may not recognise their experience as harmful. Therefore, staff should always remain vigilant and report any concerns through their academy structure in the first instance

All complaints, allegations or suspicions of abuse must be taken seriously.

Absolute promises of confidentiality should not be given as the matter may develop in such a way that these promises might not be able to be honored, as third parties may need to be involved/informed or consulted.

If the complaint/allegation comes directly from the young person or vulnerable person, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided, i.e. "Can I have a look at your injury please".

It is recognised that any employee/volunteer may encounter students who make a safeguarding disclosure or who exhibit a safeguarding 'cause for concern'.

No employee/volunteer should take any independent action themselves (i.e. a non-member of the Safeguarding Team calling Social Care) but must observe the protocol set out below, unless the individual is in crisis, in which case action should be taken to stabilise the situation, in consultation with relevant managers.

Any suspicion, allegation or incident of abuse must be reported to a Safeguarding Officer, or if one is unavailable the Designated Safeguarding Lead (or nominated Deputy) within two hours of disclosure.

If the suspicion or allegation of abuse is against an employee, it must be reported to the People Team as soon as possible.

A full record of any disclosure conversations must be made immediately after any conversations with the young person or vulnerable person by submitting an e-mail to the safeguarding mailbox, this is a secure site and monitored constantly (except for public holidays) by the Designated Safeguarding Practitioners. The details should be sent by the person to whom the disclosure was made. It must include, if known:

- the date and time of the alleged abuse
- the place where the alleged abuse happened
- the young person/vulnerable person's name
- the name of the person making the disclosure
- the nature of the alleged abuse
- a description of any injuries observed (NB: Do not ask to see them) The account, which has been given of the allegation. (If disclosed directly by the young person or vulnerable person, the account should be in their words.)
- the age of the young person/vulnerable person
- the address of the young person/vulnerable person
- contact details of the young person/vulnerable person
- the date and time of the observation/disclosure
- Designated Safeguarding Practitioner name and the name(s) of any other person(s) present.

The record should be, as far as possible, verbatim rather than summarised and it should be factual in terms of what the young person/vulnerable person or person making the disclosure (where not a direct disclosure) has reported and should not be based on opinion or assumptions.

Young people or vulnerable people with learning difficulties and/or disabilities may need additional support when making a disclosure. This may take the form of the young person/vulnerable person's nominated support being present at any interview to act as a facilitator or in an advocacy role. It should never be assumed that a young person/vulnerable person with learning difficulties and/or disabilities is not capable of providing credible evidence.

The Designated Safeguarding Practitioner(s) should record details of the suspected/alleged abuse on to the relevant recording database and, if appropriate should refer the matter to an external agency where they feel that the young person may be in need and/or may be at risk of suffering significant harm.

The relevant recording database will record the time of the referral and the name of the person (and agency).

The advice received from the referral agency on what action, if any, is to be taken should be noted and kept on file.

Any action to be taken by the college, including that agreed with the referral agency should be noted and the Safeguarding Officer/Designated Safeguarding Lead (or nominated Deputy) needs to confirm that this action is being/has been taken.

The organisation acknowledges that there are learning points from all allegations made, not just from those that are found to be substantiated.

10.2 14 – 16-YEAR-OLD STUDENTS

Where a suspicion/allegation of abuse is made in respect of a 14–16-year-old student, who is enrolled at a school or with another sponsor, employees should contact the appropriate Transition and Progression Co-Ordinator or nominated deputy. The Transition and Progression Co-Ordinator (or nominated Deputy) will liaise with the Child Protection Officer from the student's school or sponsor, ensuring that the student is informed of this process.

Where a school has sourced Alternative Provision for a child, the referring school remains responsible for the pupil(s) they have placed in Alternative Provision, this includes safeguarding arrangements.

INTERNATIONAL SPONSORED STUDENTS

The Sheffield College has a UKVI License which allows students from overseas to come and study with us on a sponsored basis. Any International Student under the age of 18 **must** have a legal guardian in the UK, selected by their parent(s). The legal guardian's role is to be a point of contact for emergencies.

The majority of U18 sponsored students will be living in Homestay arrangements (see "Host Families" section for more information) and their Homestay contact could be their legal guardian (if agreed by their parent).

In addition to having a legal guardian, any sponsored student under the age of 18 **must** have a signed consent form from their parent, indicating that they agree for the student to travel and live independently in the UK. This consent form **must** be signed by both parents with legal responsibility. Where there is sole parental responsibility, only the parent with responsibility must sign the consent form.

Any sponsored student under the age of 18 will have access to a Student Mentor for appropriate pastoral wrap-around support and will receive additional support from the International Office (i.e. living in Sheffield induction). Sponsored students over the age of 18 will also have access to a Student Mentor.

Where concerns arise around the attendance of a sponsored student (regardless of age) then the Attendance Policy should be followed, however, in addition to this the International Office should be informed. The International Office **must** inform UKVI where attendance is a concern or where a student is missing and being actively searched for by policing authorities. If a sponsored student becomes a missing person, the Major Incident Policy **must** be followed, but additionally, UKVI **must** be informed immediately.

All International sponsored students will receive the same level of safeguarding support required for their individual needs as any other student at The Sheffield College.

10.3 MANAGING STUDENT BEHAVIOUR

If through the investigation of disclosures, it is identified that college rules have been broken the matter should be referred to the appropriate Head for Student Experience for behavioural support in line with the Student Positive Engagement and Behaviour Policy.

10.4 VISIBLE IDENTIFICATION

The Sheffield College operates a visible ID policy for all staff, volunteers, students, and visitors to the college. This enables the college to ensure that only authorised persons are admitted to the buildings to maintain a safe and secure environment.

The wearing and displaying of lanyards and ID on college premises must be always enforced by all staff.

Staff should always wear their lanyard and ID, except for periods when engaged in practical activity where entanglement or other risks have been identified

Students must adhere to health and safety regulations and always remove their lanyards when undertaking practical tasks where entanglement or other risks have been identified by the tutor. Lanyards must be put on again before leaving the teaching space

10.5 THE USE OF “REASONABLE FORCE” IN COLLEGE

There are circumstances when it is appropriate for staff in college to use reasonable force to safeguard children and young people. The term “reasonable force” covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. “Reasonable” in these circumstances means, “using no more force than is needed”. The use of force may involve either passive physical contact such as standing between pupils or blocking a pupil’s path or active physical contact such as leading a pupil by the arm out of the classroom.

10.6 WORK PLACEMENTS

Employers and training organisations will be required to co-operate with the college in putting in place and subscribing to appropriate safeguards. Failure to do this will result in the college not using them as a Placement Provider.

Refer to the college's Health & Safety Vetting Procedures for Work-based Learning & Work Experience for further advice and guidance.

10.7 SUBCONTRACT PROVISION

Employers and training providers will be required to co-operate with the college in demonstrating they have robust record keeping procedures in respect of health, safety, and safeguarding. These will be monitored and managed by the Partnership and Subcontract Manager and in consultation with the Designated Safeguarding Lead, (or nominated Deputy) and/or HR when required. Failure to do so will constitute a Serious Breach.

Where the contractor or one of its subcontractors refer:

- A safeguarding concern related to sexual violence to local authority, children's social care/adult social care and or the police, or
- An allegation of abuse made against a teacher or other member of staff to the designated officer(s).

The contractor must, as soon as practicable, inform the DfE by contacting their Multi-Agency Safeguarding Hub (MASH) on 020 8359 4066 or by contacting local police if you think a child is in danger. Such notifications must include the name of the institution, a high-level summary of the nature of the incident, (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and or the police.

10.8 HOST FAMILIES

Where the college arrange for a visiting child to be provided with care and accommodation in the United Kingdom in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay. In circumstances such as this, the college will carry out relevant DBS checks on all persons over the age of 16 who permanently reside in the host residence.

10.9 SHARING OF INFORMATION

There are instances where confidential information can be lawfully shared, i.e., if it can be justified in the public interest. This would include:

- to protect a young person from harm or protect vulnerable persons from serious harm
- to promote the welfare of children
- to prevent crime and disorder.

Wherever possible consent should be sought to share information. When seeking consent be open and honest with the individual (and/or their family where appropriate) about why, how and with whom the information will, or could be shared, with. However, there will be some circumstances where consent to share information should not be sought from either the individual or their family, or information given that the information is to be shared. This would include:

- if by doing so places a person (the individual, family member, or a third party) at increased risk of significant harm if a young person, or serious harm if a vulnerable person; or
- prejudicing the prevention, detection, or prosecution of a serious crime; or
- leading to an unjustified delay in making enquiries about allegations of significant harm to a young person or serious harm to a vulnerable person.

A record should be kept of any decision made regarding information sharing, whether it is to share information or not. If the decision is made to, share information the record should include what has been shared, with whom and for what purpose.

If there is, any doubt about information sharing advice should be sought from the Designated Safeguarding Lead or their nominated Deputy.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

10.10 ALLEGATIONS ABOUT AN EMPLOYEE, VOLUNTEER OR SUPPLY STAFF

Employees must avoid placing themselves in a potentially compromising position, which could lead to an accusation of malpractice and/or a breach of safeguarding policy. This would include a situation where an employee had physical contact with a student or another employee unless it was to prevent harm.

Any suspicion, allegation or actual abuse of a young person or vulnerable person by an employee, volunteer or supply staff must be reported to the People Team within two hours of the initial concern arising.

The People Team will work with the Designated Safeguarding Lead (or nominated Deputy) to take such steps, as they consider necessary to ensure the immediate safety of the young person /vulnerable person in question and any other person who is considered at risk.

The Designated Safeguarding Lead (or nominated Deputy) will immediately notify the Executive Safeguarding Lead in order to convene the Safeguarding Executive Group, who will rapidly consider the nature of the allegation, and the evidence presented, and decide on the next appropriate course of action, e.g. suspension. (NB: Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step.)

Where it is, clear to the Safeguarding Executive Group that a young person or vulnerable person appears to have been harmed or is at risk of significant harm or a criminal act appears to have been committed:

- an immediate referral will be made by Designated Safeguarding Lead (or their nominated deputy) to Social Care or the Police for investigation.
- the Designated Safeguarding Lead (or nominated Deputy) will inform the designated officer(s) from the relevant local authority within one working day of receiving the report of an allegation and ensure that a report has been completed.
- the Designated Safeguarding Lead (or their nominated deputy) will inform the alleged offender or person about whom there is a concern of the allegation or concern as soon as possible. The designated officer from the relevant local authority will only be contacted in line with guidance issued by them.
- the Designated Safeguarding Lead (or their nominated deputy) will inform the alleged offender/person against whom the concern has been raised how enquiries will be conducted and possible outcomes, e.g. suspension without prejudice on full pay, disciplinary action, dismissal, and inform them of sources of support, e.g. professional organisations, Trade Unions and the role of the People Team.

The Designated Safeguarding Lead and Executive Director People (or their nominated Deputies) will ensure that the college operates within its Employee Disciplinary Policy & Procedure and notifies all relevant parties, i.e. designated officer from the relevant local authority, DBS, Department for Education.

The college will not take any action that might undermine any future action or disciplinary procedure, or Police investigation e.g. interviewing the alleged victim, alleged offender or possible witnesses before discussing this with the designated officer from the relevant local authority, when necessary. If appropriate, a multi-agency strategy group will be convened by the designated officer which will include representation from the college.

The college will seek advice from the designated officer from the relevant local authority about how, when and by who parents or carers should be informed unless there is an emergency, such as when a young person or vulnerable person has been injured and needs medical attention.

Any investigation conducted by the college will follow the college's procedures for investigations. Once the outcome is determined, the college will take a view on how to proceed in line with its disciplinary procedure. Any investigation should not undermine any Police investigation. However, the outcome of the college's disciplinary investigation and any subsequent action will not always be dependent on the conclusion and outcome of any Police investigation.

Where an employee, volunteer or supply staff is dismissed from the college's employment or internally disciplined because of abusive conduct relating to a young person or vulnerable person, or they leave while under investigation for allegedly causing harm or posing a risk of harm, the college will notify the DBS, as appropriate.

Where it is subsequently found that an allegation has been made maliciously the college may refer the matter to be dealt with in line with its disciplinary procedures for employees and students.

Where the allegations concern the Executive Designated Safeguarding Lead, the Chief Executive and Principal will be involved, and the Executive Designated Safeguarding Lead will play no role.

Where the allegations concern the Chief Executive and Principal, the Executive Designated Safeguarding Lead will notify and involve the Chair of the Board of Governors (or the Deputy Chair if the Chair is not available).

If the employee is unhappy with the process under which they have been submitted, they have the right to make representation through the Employee Disciplinary Policy and this should be made within five working days of the decision.

10.11 ALLEGATIONS ABOUT THE ORGANISATION

The Sheffield College complies with the Education and Skills Funding Agency (ESFA) funding agreements and contracts requirements. The ESFA have included safeguarding clauses in funding agreements and contracts since 2017-2018, which require the ESFA to be made aware when an institution is itself the subject of an investigation by the local authority or the police. The ESFA do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, the Chief Executive and Principal or the Deputy Principal is required to email Enquiries.EFA@education.gov.uk.

However, from 31st March 2025 the ESFA will cease to exist and functions related to education will move the DfE as early as October 2024. Therefore the Chief Executive and Principal or Deputy Principal will be required to report to the DfE.

The ESFA/DfE will need to know the name of the institution, the nature of the incident and confirmation that it is being, or is scheduled to be, investigated by the local authority and/or the police.

The main issues/referrals ESFA/DfE want to be notified about, where any funded students are concerned, are those that result in police investigations. ESFA/DfE needs to be sighted on these cases and satisfied the right action is in hand by responsible bodies.

The ESFA/DfE does not require institutions to routinely inform them about Prevent referrals to Channel panels. In line with the position on safeguarding more generally, the ESFA/DfE will only require institutions to inform them when an institution is itself, or one of its subcontractors, is the subject of an investigation by the local authority or the police in connection with a Prevent issue. In such circumstances, the Chief Executive and Principal or the Executive Designated Safeguarding Lead is required to email Enquiries.EFA@education.gov.uk.

10.12 ALLEGATIONS WITHOUT FOUNDATION

The college recognises that false allegations may be indicative of problems of abuse elsewhere in the life of the accuser.

If after investigation the allegations were not substantiated, i.e. a malicious attempt to undermine an employee/volunteer a record should be kept, and consideration given by the Safeguarding Executive Group to a referral to the designated officer from the relevant local authority in order that other agencies may act upon the information.

The Safeguarding Executive Group will:

- ensure the employee/volunteer against whom the allegation is made are informed by a member of the People Experience team orally and in writing that no further action will be taken. (Consideration should also be given to offering counselling/support)
- inform the parents/carers of the alleged victim (where appropriate) that the allegation has been made and of the outcome
- where the allegation was made by a person other than the alleged victim, consideration should be given to informing the parents/carers (where appropriate) of that individual
- prepare a report outlining the allegation and give reasons for the conclusion reached and confirm that the above action(s) have been taken.

10.13 SUPPORT

The college recognises that employees/volunteers who have been involved with a young person or vulnerable person who has suffered harm or appears to be likely to suffer harm may require support. Employees/volunteers can obtain support either via their line manager, The People Experience team, Trade Unions, or self-referral to Occupational Health.

10.14 RECORD KEEPING

The Designated Safeguarding Lead (or their nominated deputy) shall ensure that arrangements are in place for retaining a copy of:

- the referral on the relevant recording database (and report where appropriate)
- any notes or other correspondence dealing with the matter
- any other relevant materials

Copies of reports and other documentation should be kept securely locked for a minimum period of seven years.

Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached will be kept on the confidential personnel file and a copy provided to the employee. Copies of reports regarding allegations made against employees should be kept securely by The People Experience Team until the accused has reached normal retirement age or for a period of ten years from the date of the allegation if that is longer.

10.15 CONFIDENTIALITY

All suspicions, allegations and investigations must be kept confidential and shared only with those who need to know.

10.16 COMMUNICATION

The college will ensure that suitable and relevant information relating to safeguarding is disseminated to employees and college users. Consultation and communication over safeguarding issues will be encouraged at all levels within the college. Communication will, so far as is reasonably practicable, be produced in a format that takes on board the needs of employees and college users.