



## **Safeguarding and Child Protection Policy**

July 2026

# SAFEGUARDING AND CHILD PROTECTION POLICY

## Background

City Lit is committed to safeguarding, protecting and promoting the welfare of all its students and staff, and to ensuring the college provides a safe environment for everyone. In accordance with the [Children Act 1989](#), the [Children Act 2004](#), the [Education and Training Act 2021](#), the [Care Act 2014](#), the [Counter-Terrorism and Security Act 2015 \(Prevent Duty\)](#), and the statutory guidance [Working Together to Safeguard Children](#) and [Keeping Children Safe in Education \(KCSiE\)](#)—which applies to all post-16 Further Education providers—the college recognises its legal and moral duty to safeguard all learners.

Although City Lit is an adult college, a small number of under-18s enrol in approved curriculum areas each year. These students are afforded additional safeguarding consideration in line with the *Children Acts 1989 and 2004*, KCSiE, and local safeguarding partnership procedures. City Lit also provides education for adult learners with learning difficulties, disabilities and complex needs who may be unable to care for themselves or protect themselves from significant harm or exploitation. In accordance with the *Care Act 2014*, the college recognises its responsibilities to safeguard adults at risk. In addition, the college supports a small number of young adults aged 19–24 with an Education, Health and Care Plan (EHCP), who may be more susceptible to harm and therefore require enhanced safeguarding oversight.

City Lit recognises that any learner can experience abuse, and that those with additional needs or challenges may be more susceptible, including to both intrafamilial (inside the home) and extrafamilial (outside the home) harm. The college acknowledges that safeguarding incidents can occur anywhere, at any time, and may be perpetrated by a range of individuals including staff, other students, family members, friends, or people external to the college. It is therefore the duty of every member of staff to prevent abuse, remain vigilant to signs of harm, and take prompt and effective action when abuse is suspected or disclosed.

## 1. Purpose

- 1.1 The purpose of this policy is to promote the safety and welfare of students and staff by protecting them from and preventing abuse and neglect. It provides guidance to staff on what to do if abuse, neglect or other causes for concern are observed or disclosed.

For the purposes of this policy we define, Safeguarding children and adults at risk as protecting them from:

- significant harm
- exploitation
- abuse (see Appendix 5)

## 2. Introduction

### 2.1 What is safeguarding?

Safeguarding children and adults at risk is the action we take to promote their welfare and to protect them from harm. Everyone who comes into contact with children, their families

or adults at risk has a role to play to ensure they are safe.

City Lit fully recognises its responsibility to promote safe practice and to reasonably protect and safeguard the welfare of everyone working and studying here. Students at City Lit are 19 years or older except in clearly defined curriculum areas:

- Speech Therapy
- Lipreading
- English, Maths, Digital Skills and BSL for Deaf people
- Students with an Education Health Care Plan assessed by the Access, Inclusion & Support Team

However, we acknowledge a general duty of care to all our students.

We believe that learning takes place most effectively within a culture where all individuals trust the college to keep them safe from harm while they are here and, where appropriate, give information, advice and support to keep themselves safe from harm at other times.

We take all reasonable measures to ensure that the risks of harm to individual's welfare are minimised; and where there are concerns about individual's welfare, we take proportionate and appropriate actions to address these.

Safety is embedded within good practice, and by empowering students to protect themselves, make their views known, and be listened to. All students should feel safe, secure and able to raise any concerns at any time.

We work to agreed local policies and procedures in partnership with other relevant local agencies.

We fulfil our statutory duty to safeguard children and adults at risk by:

- providing a safe learning environment in which all students can progress
- informing students how to keep themselves safe from harm and the procedures to follow if they believe that they, or another student, is at risk
- following Safer Staff Recruitment procedures for staff and volunteers [City Lit Staff Hub - Safer Recruitment Guidance.pdf - All Documents](#)
- ensuring staff and volunteers are aware of the procedures to follow if they think a student is at risk
- taking appropriate action if we suspect a child or adult at risk is at risk.

The college will report all allegations of abuse to the [London Boroughs of Camden](#) or [Westminster](#), or other relevant borough [Local Authority Designated Officers](#) based on a student's registered address. Allegations of suspected radicalisation and extremism may be referred to [CHANNEL panel](#). If the report involves an allegation of a criminal act, a report will be made to the Police, and the college will fully co-operate with any investigations they carry out. The college will act on all reports of alleged abuse regardless of whether they are recent, reported to have taken place in the past, have taken place on college premises or within the community.

In line with [Keeping Children Safe in Education \(KCSiE\)](#), the college acknowledges that safeguarding now includes the management of cyber security risks, including the protection of sensitive information, secure access to digital systems, and the safe use of

online platforms and emerging technologies such as Artificial Intelligence (AI). Colleges are required to ensure that filtering and monitoring systems meet Department for Education (DfE) standards, to follow the [DfE's Cyber Security Standards for Schools and Colleges, Generative Artificial Intelligence \(AI\) in Education \(updated 2025\)](#), which sets out expectations for safe, responsible and effective use of AI in schools and FE settings. These documents aim to educate learners about online harms, misinformation, deepfakes, and other digital threats. The college therefore maintains robust information-security controls, conducts cyber-risk assessments, and ensures staff are trained to recognise and respond to cyber-enabled safeguarding concerns as part of its wider safeguarding responsibilities.

The college will ensure that appropriate filtering and monitoring systems are in place as well as appropriate levels of security protection procedures to keep staff and learners safe online. These are aligned with the [ICT and Digital Acceptable Use Policy City Lit Staff Hub - ICT & Digital Acceptable Use Policy 2023.pdf - All Documents](#) Information Security Policy and E-Safety guidelines, and support provision of a safe environment in which to work and learn, and to limit exposure to potential risks from the college's IT system. The effectiveness of the filtering and monitoring systems will be reviewed annually.

All staff will be made aware of the reporting process to escalate concerns if:

- There is/ or a suspected breach of the ICT and Digital Acceptable Use Policy
- They witness or suspect unsuitable material has been accessed.
- They can access unsuitable material.
- Are teaching topics which could create unusual activity on the filtering logs.
- There is a failure in the software or abuse of the system.
- There are perceived unreasonable restrictions that affect teaching learning or administrative tasks.
- They notice abbreviations or misspellings that allow access to restricted material.

In instances related to staff please follow the reporting process as highlighted in the whistleblowing policy. In concerns related to learners at risk please follow the reporting process as highlighted in Appendix 3 of this policy.

## **2.2 Who are we safeguarding?**

We have a legal duty to safeguard all children and adults at risk.

City Lit recognises a broader scope of people who may be more susceptible to harm, abuse and exploitation. This definition does not affect how safeguarding incidents are managed; however, it informs managers and staff that, in certain situations, some students may require more support and assistance than others.

## **3. Aims of the policy**

Safeguarding encompasses a range of activities aimed at protecting individuals' right to live in safety and free from abuse and neglect. The policy aims to:

- Prevent abuse, radicalisation and extremism by providing teaching and learning support, which establishes a safe environment where students can learn in confidence, independence and feel they will be listened to.

- Raise awareness of all staff for the need to safeguard children and adults at risk, and their responsibilities to identify and report possible cases of abuse, Radicalisation and Extremism
- Provide a framework for the continuous development of internal procedures to be followed by members of the college community in cases of suspected abuse
- Emphasise the need for good levels of communication and information sharing between all members of staff
- Provide a means of monitoring students known or thought to be at risk
- Promote understanding and build relationships with other agencies in order to develop multi-agency working and information sharing
- Ensure that learners know that there are Safeguarding Officers whom they can approach if they are worried or in difficulty
- Provide appropriate support to staff through appropriate supervision and training
- Assess risk in relation to all college activities, focussing on prevention, minimising risk and putting appropriate safeguards in place

#### 4. Prevent duty

The **Prevent Duty** is a legal requirement for all Further Education (FE) providers in England. It comes from the Counter-Terrorism and Security Act 2015, which places a statutory duty on colleges to have due regard to the need to prevent people from being drawn into terrorism.

City Lit fulfils its statutory responsibilities by:

- protecting learners from radicalisation, extremist narratives, and online influences that may place them at risk.
- The college assesses local and online risks, maintains robust safeguarding and IT policies, and ensures that external speakers and activities are appropriately managed.
- All staff are required to complete Prevent training, remain alert to signs of radicalisation or extremist influence, and report concerns immediately to the Designated Safeguarding Lead in line with safeguarding procedures.
- Through partnership with local authorities, police Prevent teams and safeguarding partners, the college ensures that learners who may be susceptible to radicalisation receive timely support, including referral to Channel where appropriate.

#### 5. Safeguarding structure and responsibilities

Key staff who have designated safeguarding responsibilities:

- The Vice Principal (Curriculum and Quality) is the Designated Safeguarding Lead (DSL), who has overall responsibility and accountability.
- The Deputy Designated Safeguarding Lead (DDSL) is the Head of Quality and Tutor Development
- Supporting the Lead and Deputy Lead are a team of Safeguarding Officers who are able to respond to safeguarding concerns as they occur. They ensure that these are recorded and reported through to the Lead and Deputy. (see Appendix 1)
- The Safeguarding Strategic Review Group oversee all aspects of Safeguarding for the college to fully comply with legislation and be clear about our duty of care to students and staff. (see Appendix 1)

- Under the guidance of the DSL and DDSL, the Director of Funding & Technology Support, is the nominated manager for e-safety.
- In those areas where staff and students work with children as part of their roles (Family Learning), a manager has responsibility for leading specific Safeguarding requirements in their area of work.
- In the Centre for Learning Disabilities Education the Head of Centre leads on specific Safeguarding requirements in this area of work.
- The HR team are responsible for managing the DBS checking service with new and current staff and volunteers.

The Board will:

- Ensure the college has a Safeguarding policy and procedures in place that comply with legislation and are available to staff and students
- Take action in the event of allegations of abuse being made against the Principal
- Ensure the Quality Committee provide appropriate oversight and scrutiny for Safeguarding at the college

The Designated Safeguarding Lead/Deputy Designated Safeguarding Lead will:

- Inform the Principal immediately of any serious Safeguarding alerts which require a Safeguarding report or referral to be made to external agencies, or to the Police for suspected criminal acts
- Provide the Quality Committee with an annual Safeguarding report and ensure they are kept informed of incidents as well as the work of the Safeguarding team
- The designated safeguarding lead is expected to refer cases:
  - of suspected abuse and neglect to the local authority social care as required and support staff who make referrals to local authorities
  - to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
  - where a person is dismissed or left due to risk/harm to the Disclosure and Barring Service as required, and where a crime may have been committed to the Police as required.
- act as a source of support, advice and expertise for all staff
- act as a point of contact with safeguarding partners
- liaise with the Principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and Section 42 of the Care Act 2012 and police investigations.
- as required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for child/adult at risk protection concerns
- liaise with relevant staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that student’s needs are considered holistically
- liaise with the relevant staff where safeguarding concerns are linked to mental health
- promote supportive engagement with carers in safeguarding and promoting the welfare of students, including where families may be facing challenging circumstances
- work with relevant staff to promote educational outcomes by knowing the welfare, safeguarding and protection issues that students in need are experiencing, or have experienced, and identifying the impact that these issues might be having on

attendance, engagement and achievement at college.

- The designated safeguarding lead is responsible for ensuring that safeguarding records are kept up to date and are stored and managed in compliance with UK GDPR regulations.
- Ensure appropriately trained Safeguarding staff are in place
- Organise the delivery of appropriate training and support for staff across the college
- Organise the development and distribution of guidance materials for staff and students
- Ensure that all staff feel able to raise concerns about poor or unsafe practice regarding Safeguarding, and that concerns are addressed sensitively and effectively
- Promptly refer cases of suspected abuse or allegations to relevant investigating agencies
- Ensure students are aware of Safeguarding procedures and where to find information in the Help Centre
- Ensure all staff have access to and understand the college's Safeguarding policy and procedure
- Maintain contact with Local Authority Safeguarding Boards and FE/HE Prevent Co-ordinators
- Be responsible for creating and managing both the strategic and operational risk register for Safeguarding
- Act as the main point of contact for Safeguarding
- Draw Safeguarding together across all areas of City Lit's work and identify priorities
- Ensure ownership of Safeguarding across the college
- Monitor the progress of action plans
- Undertake appropriate training for their role

Safeguarding Officers will:

- Recognise how to identify signs of abuse and when it is appropriate to make a referral
- Keep detailed, accurate and secure written records of alerts and/ or concerns
- Undertake investigations as directed by the DSL/DDSL
- Undertake training as necessary
- Act as a point of contact for Safeguarding and support queries from staff in their department/service area

It is the responsibility of all City Lit staff to:

- Promote the welfare of students
- Know who the DSL, DDSL and Safeguarding Officers are to raise concerns with
- Be vigilant and able to spot signs of harm, abuse and exploitation
- Raise/report any concerns or suspicions immediately to a Safeguarding Officer, the DSL or DDSL
- Share information about vulnerable individuals within the college
- Undertake training as necessary

All staff and volunteers should feel able to raise concerns about anything they consider may be poor or unsafe practice. If any member of staff has any concerns about the actions taken by a Safeguarding Officer, s/he may contact another Officer to discuss the situation; they may also raise concerns through our **Whistleblowing procedure**. [City Lit Staff Hub - Whistleblowing Policy approved July24.pdf - All Documents](#)

## **6. Procedures to be invoked when harm/abuse is suspected or reported (See Appendix 3)**

If anyone comes across signs of harm and/or abuse of children or adults at risk they should:

- i. Report any concerns to a Safeguarding Officer in the first instance. You can also report concerns to the Duty Manager and/or your line manager who will liaise with the Safeguarding Team.
- ii. This will invoke the appropriate procedures and may involve the local Safeguarding Board and/or the police or another relevant specialist service.
- iii. Where staff members are unsure and need guidance about Safeguarding issues, they are encouraged to seek support from a Safeguarding Officer, manager or the Designated Safeguarding Lead/Deputy.

If anyone considers that a child or adult at risk is in immediate danger or at risk of harm s/he should:

- iv. Contact the DSL, DDSL, a Safeguarding Officer or the Duty Manager immediately. They will decide on the most appropriate course of action, which may include making a referral to the most appropriate agency or emergency service.

## **7. Allegations about members of the workforce**

Where an allegation of abuse or inappropriate behaviour is made against a member of staff, a thorough investigation will be undertaken.

Statutory and other relevant guidance will be used to support any investigation.

Where any incident relates to actions as an employee of City Lit, in addition to actions set out above, Human Resources will advise and support the line manager of, and the employee against whom allegations have been made.

Where an allegation of abuse or inappropriate behaviour is made against a student, in addition to actions set out above, the Vice Principal and Executive Director: People will advise on the disciplinary procedure.

The DSL/ DDSL, in collaboration with senior colleagues, will decide any action to be taken. It is the duty of staff to inform only, not to investigate.

## **8. Control measures**

### **Students**

We take a risk management approach to Safeguarding, in organising learning and teaching, and delivery of services to students and the public. Where necessary curriculum and service areas carry out specific risk assessments, and make reasonable, proportionate adaptations to their activities.

Where adaptations are reasonable and proportionate, we may put in place 'control measures' in order to safeguard the wellbeing of children and adults at risk.

Children aged 16-18 are only admitted to designated programmes following approval by the DSL/DDSL and a risk assessment by the relevant Head of Programme/Centre.

Children aged under 16 are not admitted to normal classes, unless the class is specifically for children and parents/guardians. This is primarily in local authority Family Learning provision.

### **Other groups**

Where children of students, staff members or visitors are present in any college site, they remain the responsibility of their parent/guardian and must be accompanied at all times whilst on the premises.

Safeguarding the wellbeing of any children visiting City Lit without their parent/guardian is the responsibility of the organiser of the activities in which the child is participating.

### **Staff and volunteer controls**

For newly appointed staff:

- i. Verification of the appointed person's identity, preferably from current photographic ID and proof of address.
- ii. Obtaining an enhanced DBS (Disclosure and Barring Service) check (with barred list information if appropriate) for staff identified in appendix 2
- iii. Verification of the appointed person's right to work in the United Kingdom
- iv. Verification of relevant qualifications where necessary.
- v. Other checks may be considered if the person has recently lived outside of the United Kingdom.

DBS checks:

- vi. DBS checks will be obtained (as detailed in appendix 2) and held on a Single Central Record.
- vii. DBS checks will normally be obtained prior to the commencement of any work where a DBS check is required.
- viii. Where a DBS check has not yet been received, a department may allow supervised access or accept a portability check following a risk assessment.
- ix. City Lit will adhere to all relevant regulations and codes of practice as issued by the DBS.
- x. All information regarding the detail of any DBS certificates will be processed by Human Resources and will not be passed to third parties. The date and number of DBS checks may be passed to partner organisations to enable City Lit to fulfil its contract and may be issued as part of a portability check by another organisation.
- xi. Human Resources will confirm to the relevant programme / service manager whether a satisfactory DBS check has been obtained. This information will be recorded securely. If items appear on the DBS check that give cause for concern, Human Resources will discuss these with the relevant line manager. Human Resources will then discuss with the applicant if any conditions are to be applied or the offer withdrawn.

## **9. Training**

- The DSL and DDSL will undertake Safeguarding update/refresher training annually and regularly update their knowledge and skills in a range of ways including attending briefings, reading Safeguarding newsletters and subscribing to email bulletins.

- City Lit will ensure that the DSL and DDSL undertake training in multi-agency working and specific Safeguarding areas as appropriate.
- All staff will receive Safeguarding training and updates as required and appropriate. This will include reminders on the college referral processes
- Records of Safeguarding training will be kept for staff

#### **10. Confidentiality**

Confidentiality is an issue that needs to be fully understood by all those working with Safeguarding duties. A member of staff must never guarantee confidentiality to anyone with a Safeguarding concern or promise to keep a secret.

In accordance with statutory requirements, Safeguarding concerns must be reported to the DSL or DDSL and may require further referral to, and subsequent investigation, by statutory agencies

Information on individual cases may be shared by the DSL and DDSL with other relevant staff members on a 'need to know' basis only and where it is in the person's best interests to do so.

#### **11. Records and Information Sharing**

Where there are concerns about the safety of a child or adult at risk, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst Data Protection legislation (including the General Data Protection Regulation, 2018) places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would place a child or adult at risk, at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life should not prevent sharing where there are real safeguarding concerns. Fears about sharing information should not stand in the way of the need to safeguard and promote the welfare of children or adults at risk who are at risk of abuse or neglect.

Well-kept records are essential to good protection practice. City Lit is clear about the need to record any concern held about a person within the college, the status of such records and when these records need to be shared with other agencies. City Lit ensures that the Department for Education's *Information Sharing Advice for Practitioners* is followed. [Information sharing advice for safeguarding practitioners - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Information-sharing-advice-for-safeguarding-practitioners.pdf)

A disclosure of abuse, or concerns about signs or indicators of abuse will be recorded by a member of the Safeguarding team or through City Lit's incident reporting procedure. All records will be dated and signed and will include any action taken at the time. This is then presented to the DSL or DDSL who will decide on the next steps.

#### **12. Multi agency working**

It is the responsibility of the DSL and DDSL to ensure, wherever appropriate, that the college is represented at any Safeguarding conference affecting one of our students.

#### **13. Whistleblowing**

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider college community) raises a concern about danger or illegality that affects others.

City Lit expects the highest standards of conduct and practice related to Safeguarding from

every member of staff, governor and visitor to the college.

Staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with college's Whistleblowing policy. [City Lit Staff Hub - Whistleblowing Policy approved July24.pdf - All Documents](#)

## Appendix 1 - Safeguarding Team

| Safeguarding Strategic Review Group |                                                              |                                       |                                                                                  |
|-------------------------------------|--------------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------------|
| Name                                | Responsibility                                               | Department                            | E-mail                                                                           |
| Wendy McKaig                        | Designated Safeguarding Lead                                 | Executive                             | <a href="mailto:wendy.mckaig@citylit.ac.uk">wendy.mckaig@citylit.ac.uk</a>       |
| Dragana Ramsden                     | Deputy Safeguarding Lead                                     | Quality                               | <a href="mailto:dragana.ramsden@citylit.ac.uk">dragana.ramsden@citylit.ac.uk</a> |
| Caroline Blaxall                    | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Student Services and Enrolments       | <a href="mailto:abida.umarji@citylit.ac.uk">abida.umarji@citylit.ac.uk</a>       |
| Graham Jennings                     | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Data Compliance and Business Planning | <a href="mailto:graham.jennings@citylit.ac.uk">graham.jennings@citylit.ac.uk</a> |
| Michael Donlevy                     | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Learning Disabilities Education       | <a href="mailto:michael.donlevy@citylit.ac.uk">michael.donlevy@citylit.ac.uk</a> |
| Emma Maidment                       | Safeguarding Officer/<br>Safeguarding Strategic Review Group | HR                                    | <a href="mailto:emma.maidment@citylit.ac.uk">emma.maidment@citylit.ac.uk</a>     |
| Darren Jones                        | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Business Development & Improvement    | <a href="mailto:jamie.smith@citylit.ac.uk">jamie.smith@citylit.ac.uk</a>         |
| Jayne Kay                           | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Visual Arts                           | <a href="mailto:jayne.kay@citylit.ac.uk">jayne.kay@citylit.ac.uk</a>             |
| Simon Goodier                       | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Skills, Employment and Wellbeing      | <a href="mailto:simon.goodier@citylit.ac.uk">simon.goodier@citylit.ac.uk</a>     |
| Orlane Russell                      | Safeguarding Officer/<br>Safeguarding Strategic Review Group | Access, Inclusion and Support         | <a href="mailto:orlane.russell@citylit.ac.uk">orlane.russell@citylit.ac.uk</a>   |

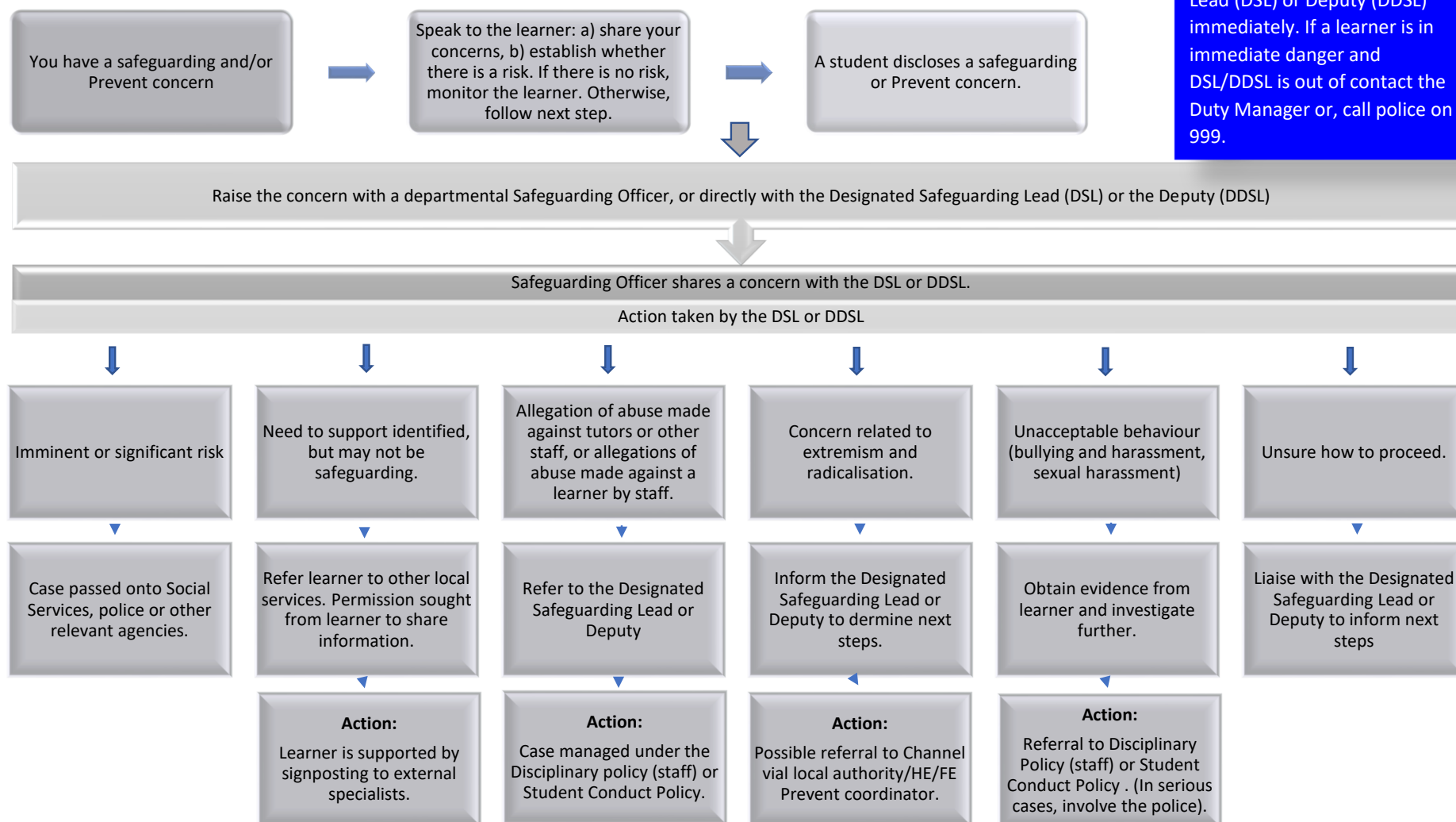
| Safeguarding Officers Group     |                                      |
|---------------------------------|--------------------------------------|
| Department / Service            |                                      |
| Student Services and Enrolments | Justin Barton                        |
| Quality                         | Karin Kalfus                         |
| Health and Wellbeing            | Alan Billington                      |
| Visual Arts                     | Heloise Parke                        |
| Creative Writing                | Katell Pinchon                       |
| Universal Skills                | Sobia Butt                           |
| Deaf Education                  | Mark Hopkinson                       |
| Learning Disabilities Education | Alex Thomas                          |
| Performing Arts                 | Ed Breen                             |
| Languages                       | Claudio Guasti<br>Francesco Buccioli |
| Counselling                     | Tamikah Andrew-Thomas                |
| MIS                             | Shilpe Bibi                          |

## Appendix 2 – DBS checks

| Work area                                                                    | Worker type                                                                        | Employment status | Work designation                      | DBS check required                    |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------|---------------------------------------|---------------------------------------|
| <b>Centre for Deaf Education</b>                                             | Interpreters, communication support workers and note-takers working in FE colleges | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
|                                                                              | Teachers – Lipreading courses                                                      | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
|                                                                              | Teachers – English, Maths, Digital Skills and BSL for Deaf people                  | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
| <b>Speech Therapy</b>                                                        | Teachers – Courses for adults who stammer                                          | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
| <b>Centre for Learning Disabilities Education</b>                            | Teachers                                                                           | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
| <b>Any curriculum area with a student with an Education Health Care Plan</b> | Teachers                                                                           | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
|                                                                              | Learning Support Tutors                                                            | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
| <b>Access, Inclusion &amp; Support Service</b>                               | Learning Support Tutors                                                            | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
|                                                                              | Volunteer Counsellors                                                              | Volunteer         | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |
| <b>Safeguarding Team</b>                                                     | Safeguarding Officers                                                              | Employee          | Regulated<br><i>Specified Setting</i> | Enhanced with barred list information |

DBS checks will normally be updated whenever there is cause to believe that circumstances have changed or if required by our contract with a receiving organisation.

### Appendix 3: Flowchart - dealing with suspected abuse and/or disclosure of abuse



#### **Appendix 4: Local and national support contact details for safeguarding and prevent concerns**

Camden Council Adult Social Care Information & Access team,  
telephone: 020 7974 4000 and select option 1  
Emergency Duty Team on 0207 974 4444 or contact emergency services on 999  
Email: [adultsocialcare@camden.gov.uk](mailto:adultsocialcare@camden.gov.uk)

Camden Children and Families Contact Service (formerly MASH)  
Duty Manager 020 7974 3317. Out of hours 020 7974 4444  
Email [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)

Age UK Camden 020 7239 0400 / [www.ageuk.org.uk](http://www.ageuk.org.uk)

MIND Camden 020 7241 8999 / [www.mindincamden.org.uk](http://www.mindincamden.org.uk)

Samaritans 116123 (Freephone)

North London Rape Crisis (Solace Women's Aid) 0808 801 0305 (not 24 hrs) /  
[www.solacewomensaid.org](http://www.solacewomensaid.org)

Sexual Assault Referral Centre (SARCs) -08088 010818 / [www.thesurvivorstrust.org/sarc](http://www.thesurvivorstrust.org/sarc)

(SARCs offer confidential and non-judgemental advice to victims and survivors of sexual assault and abuse regardless of when the incident occurred.)

Male Survivors Partnership - <https://malesurvivor.co.uk/>  
- Helpline: 0808 800 5005

NSPCC Helpline, telephone 0808 800 5000

Childline, telephone 0800 1111

Camden Early Intervention Service  
Phone: 020 3317 6590  
Email: [cim-tr.CamdenEIS@nhs.net](mailto:cim-tr.CamdenEIS@nhs.net)

Opening hours: Monday to Friday, 9.00am - 5.00am.

Camden Domestic Violence Support  
Email: [camdensafetynet@camden.gov.uk](mailto:camdensafetynet@camden.gov.uk)  
Website: [www.camden.gov.uk/domesticviolence](http://www.camden.gov.uk/domesticviolence)  
Phone: 020 7974 2526

ASB Support offers practical and emotional support to those affected by Anti-Social Behaviour and can be contacted on 020 7506 3224

Camden Council Hate Crime Concerns  
[CommunitySafety@camden.gov.uk](mailto:CommunitySafety@camden.gov.uk)

## PREVENT CONCERNS

DfE FE/HE Regional Prevent Coordinator for London

Jennie Fisher - Counter Extremism Division

Email: [jennie.fisher@education.gov.uk](mailto:jennie.fisher@education.gov.uk)

Mobile: 07880 469588

Camden Council Prevent Contact

[prevent@camden.gov.uk](mailto:prevent@camden.gov.uk)

Prevent Co-ordinator – Albert Simango

[Albert.simango@camden.gov.uk](mailto:Albert.simango@camden.gov.uk)

Prevent Education Officer – Jane Murphy

[Jane.murphy@camden.gov.uk](mailto:Jane.murphy@camden.gov.uk)

Met Police Prevent Contacts:

[SO15Mailbox-LocalOpsNorthWestTeam1@met.police.uk](mailto:SO15Mailbox-LocalOpsNorthWestTeam1@met.police.uk)

## **Appendix 5: Categories of Harm and Legal Framework for Safeguarding in Further Education**

This appendix outlines the categories of harm relevant to learners in Further Education (FE) settings and the statutory framework that underpins safeguarding responsibilities for both children (under 18s) and adults at risk. It reflects the requirements of UK legislation and statutory guidance, including:

- *Children Act 1989*
- *Children Act 2004*
- *Education and Training Act 2021*
- *Working Together to Safeguard Children*
- *Keeping Children Safe in Education (KCSiE)*
- *Care Act 2014*
- *Counter-Terrorism and Security Act 2015 (Prevent Duty)*
- *Data Protection Act 2018 / UK GDPR*
- Local Safeguarding Partnership procedures

### **1. Safeguarding Children (Under 18s)**

Under the *Children Acts 1989 and 2004* and *KCSiE*, safeguarding children means:

- Protecting children from maltreatment
- Preventing impairment of health or development
- Ensuring safe and effective care
- Taking action to enable children to have the best outcomes

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

#### **1.1 Categories of Abuse (Children) as referenced from KCSiE**

Children may experience harm in a range of ways, including:

Physical abuse:

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse:

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including

cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone

#### Sexual abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or assault by penetration) or non-penetrative acts such as sexual assault, masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

#### Neglect:

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### Child-on-child abuse:

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical

harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child criminal exploitation (CCE):

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE):

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or assault by penetration) or nonpenetrative acts such as sexual assault, masturbation, kissing, rubbing, and touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

#### Domestic abuse:

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female genital mutilation (FGM): Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. ([Mandatory reporting of FGM guidance](#)).

#### Mental health:

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow the Safeguarding and child protection policy and by speaking to the designated safeguarding lead or a deputy.

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

#### Radicalisation and Extremism

As defined under the [Prevent Duty](#), where a child is drawn into extremist ideologies or terrorism.

## 2. Safeguarding Adults at Risk

Under the *Care Act 2014*, an adult at risk is someone aged 18 or over who:

- Has care and support needs
- Is experiencing, or at risk of, abuse or neglect
- Is unable to protect themselves because of those needs

Safeguarding adults means protecting their right to live in safety, free from abuse and neglect, while promoting wellbeing, autonomy, and choice.

## **2.1 Categories of Harm (Adults)**

Adults at risk may experience:

### **Care Act 2014 – Categories of Abuse and Neglect (Full Definitions)**

#### **1. Physical Abuse**

Includes actions that cause physical harm such as hitting, slapping, pushing, kicking, misuse of medication, inappropriate restraint, or force-feeding. It also includes rough handling or any behaviour that results in injury or pain.

#### **2. Domestic Abuse**

Covers a wide range of abusive behaviours between people aged 16 or over who are personally connected. This includes physical, emotional, coercive or controlling behaviour, sexual abuse, financial abuse, and psychological harm. It also includes so-called “honour-based” abuse, forced marriage, and female genital mutilation (FGM).

#### **3. Sexual Abuse**

Involves any sexual activity where the adult has not consented, cannot consent, or is coerced. This includes rape, sexual assault, sexual acts without consent, sexual harassment, sexual exploitation, and inappropriate touching. It also includes online sexual abuse and exposure to sexualised content without consent.

#### **4. Psychological or Emotional Abuse**

Includes threats, humiliation, intimidation, controlling behaviour, harassment, verbal abuse, isolation, and denial of contact with others. It also includes cyber-harassment, gaslighting, and emotional manipulation.

#### **5. Financial or Material Abuse**

Involves theft, fraud, exploitation, pressure around money or property, misuse of benefits, coercion to sign financial documents, or improper control of an adult’s finances. It includes scams, online fraud, and misuse of personal banking or digital accounts.

#### **6. Modern Slavery**

Covers slavery, human trafficking, forced labour, domestic servitude, debt bondage, and exploitation for criminal or sexual purposes. Victims may be controlled through threats, coercion, or deception.

#### **7. Discriminatory Abuse**

Includes harassment, slurs, or unequal treatment based on protected characteristics such as race, gender, disability, age, religion, sexual orientation, or gender identity. It includes hate crime, exclusion, and degrading treatment linked to prejudice.

#### **8. Organisational or Institutional Abuse**

Occurs in settings such as care homes, hospitals, supported living, or community services. It includes poor care practices, neglect, rigid routines, lack of choice, unsafe environments, or cultures that tolerate disrespect, bullying, or substandard care.

#### **9. Neglect and Acts of Omission**

Includes failure to meet basic needs such as nutrition, hydration, medication, personal care, or access to healthcare. It also includes ignoring medical or physical needs, withholding assistance, or failing to provide a safe environment.

## 10. Self-Neglect

Covers extreme lack of self-care, failure to maintain personal hygiene or health, unsafe living conditions, hoarding, or refusal of essential support that places the adult at risk of harm.

## 3. Additional Safeguarding Risks (Children and Adults)

Some forms of harm apply to both children and adults, though thresholds and responses differ:

- Cyber security and online safety risks, including identity theft, fraud, grooming, and exposure to harmful content such as misinformation, disinformation or conspiracy theories.
- Hate crime and discriminatory abuse
- Domestic abuse
- Modern slavery and trafficking
- Radicalisation and extremism (Prevent Duty)
- Mental health crises and suicide
- Substance misuse
- Homelessness or risk of homelessness

## 4. Legal Duties of FE Providers

FE colleges must:

- Comply with *KCSiE* for all learners
- Comply with the *Care Act 2014* for adults at risk and *Children Act 1989* and *2004* for under 18 learners.
- Follow *Working Together to Safeguard Children*
- Meet Prevent Duty requirements
- Ensure safe recruitment under the *Safeguarding Vulnerable Groups Act 2006*
- Support learner autonomy in decision making aligned to *Mental Capacity Act 2005*
- Protect personal data under the *Data Protection Act 2018 / UK GDPR*
- Work in partnership with local safeguarding children partnerships (LSCP) and Local safeguarding adult boards (LSAB)
- Maintain robust filtering, monitoring, and cyber-security systems in line with DfE standards
- Ensure staff are trained to recognise and respond to all categories of harm

|                                   |                                         |
|-----------------------------------|-----------------------------------------|
| <b>Executive Owner</b>            | Vice Principal (Curriculum and Quality) |
| <b>Policy Owner</b>               | Vice Principal (Curriculum and Quality) |
| <b>Approval Body</b>              | Governing Body                          |
| <b>Date Approve</b>               | 7 <sup>th</sup> July 2026               |
| <b>Review Period</b>              | Annual                                  |
| <b>Next Scheduled Review Data</b> | Every year from date approved           |

## Version tracking

| Versions | Date     | Author          | Reason for changes                                                                                                       |
|----------|----------|-----------------|--------------------------------------------------------------------------------------------------------------------------|
| 5        | 18/11/19 | Wendy McKaig    | Replacement                                                                                                              |
| 6.1      | 12/05/21 | Graham Jennings | Text changes to 2.2, Safeguarding Team members updated in Appendix 1, Changes to Appendix 3 and new Covid-19 Annex added |
| 7        | 09/05/22 | Wendy McKaig    | Extended introduction and aims, Updated Appendix 2,3 and 4. Embedding Prevent into                                       |

|   |            |              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---|------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |            |              | Safeguarding policy. Updating roles and responsibilities and memberships                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8 | 14/06/24   | Wendy McKaig | Addition of section on Filtering and Monitoring – pages 3 and 4. Update of details of departmental safeguarding officers Appendix 1. Update of DBS checks – Appendix 2, removal of Community Outreach staff and Crèche workers from DBS required list as the department has closed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 9 | 02/06/2026 | Wendy McKaig | Substantial updates to the following sections: <ul style="list-style-type: none"> <li>• <b>Background</b> – directly referencing relevant legislation</li> <li>• <b>Introduction</b> – including links to local authority information, CHANNEL and digital safeguarding updates</li> <li>• <b>Section 4</b> – enhanced information on Prevent</li> <li>• <b>Section 5</b> – enhanced information on role of DSL/DDSL</li> <li>• <b>Section 11</b> – enhanced information on information sharing directly referencing DfE guidance</li> <li>• <b>Appendix 1</b> – updates to safeguarding officers information</li> <li>• <b>Appendix 5</b> – new addition giving specific context and detail on types of abuse for both children and adults at risk</li> <li>• Embedded hyperlinks to relevant college policies throughout as well as external safeguarding information/partners/reporting channels</li> </ul> |
|   |            |              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

#### Classification

|                         |        |
|-------------------------|--------|
| Document Status         | Active |
| Document Classification | Open   |