




Pengwern College

Safeguarding and Child Protection Policy

WALES

Our DSPs are Karen Ford and Nicola Brantley who are senior members of our leadership team.

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1. Aims

Our School/College is committed to ensuring the safety, welfare and wellbeing of every learner in our care—whether under 18 or aged 18 and above. We aim to prevent harm, recognise emerging concerns early, and respond swiftly with appropriate support.

By clearly defining our aims, we set expectations for staff, learners and partners, underpinned by statutory duties and best practice in both child- and adult-safeguarding.

- Take timely, effective action whenever there is a safeguarding concern.
- Equip all staff with the knowledge and confidence to recognise, report and record concerns. • Foster an environment where learners feel safe to speak up, and know how to seek help.
- Work in close partnership with families, social care, health services and other agencies.
- Review and refine our safeguarding arrangements continuously, based on feedback and case-work learning.
- These aims ensure that safeguarding is embedded in everything we do—from induction and training to curriculum design, daily routines and strategic governance.

2. Legislation & Statutory Guidance

Our safeguarding arrangements are grounded in a robust legal and policy framework. By aligning with current legislation and statutory guidance, we ensure that every learner—whether under 18 or an adult learner—benefits from protections enshrined in law and best-practice recommendations.

Key legislation and guidance include:

- Education Act 2002, Section 175 – duty of schools/colleges to safeguard children
- Keeping Learners Safe: Statutory Guidance for Schools and Colleges (2022)
- All Wales Child Protection Procedures (2008)
- Working Together to Safeguard People: Code of Practice (December 2022)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Social Services and Well-being (Wales) Act 2014
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards – capacity and consent
- Data Protection Act 2018 and GDPR – lawful information sharing and record-keeping
- Additional Learning Needs and Education Tribunal (Wales) Act 2018 (ALNET Act)
- Additional Learning Needs (ALN) Code for Wales 2021
- Social Services and Well-being (Wales) Act 2014
- Regulation and Inspection of Social Care (Wales) Act 2016

3. Links with Other Policies

Our safeguarding and child protection policy does not operate in isolation. It is part of a wider suite of documents and procedures that collectively uphold learner welfare. Clear cross-policy alignment ensures consistency, avoids gaps or overlaps, and enables swift, coordinated action when concerns arise.

All staff are familiar with the following related policies and understand how they interact with this document:

- **Behaviour Policy** defines standards of conduct, outlines responses to peer-on-peer incidents and supports restorative approaches.
- **Staff Code of Conduct** sets out expectations for professional boundaries, low-level concerns, and staff–learner interactions.
- **Recruitment & Selection Policy** ensures safer recruitment through DBS checks, pre-employment vetting and induction training in safeguarding.
- **Attendance Policy** governs registration, absence monitoring and protocols for learners missing from education (see Section 16 and Appendix A3).
- **Online Safety Policy** details technical controls (filtering, monitoring) (see Section 15 and Appendix A4).
- **Whistleblowing Policy** provides confidential routes for staff or learners to report colleagues' misconduct or policy breaches.
- **Complaints Policy** handles non-safeguarding grievances, ensuring safeguarding concerns are escalated correctly to the DSP/ASL.
- **Data Protection Policy** guides lawful processing and secure storage of personal data; integrates with confidentiality and information-sharing obligations (see Section 6).
- **Over-18s Safeguarding Policy** covers adult related safeguarding guidance and reporting mechanisms for learners over 18 years

4. Definitions

Our policy uses the following key terms. Where detailed categories appear, refer to Appendix A1 for full definitions and examples.

- **Safeguarding and promoting welfare** – All measures to protect learners from maltreatment, prevent impairment of health or development, ensure safe and effective care, and enable all to achieve best educational and personal outcomes.
- **Child protection** – Activities undertaken to protect individual children (under 18) who are suffering, or likely to suffer, significant harm.
- **Adult safeguarding** – Measures to protect adults (over 18s) whose independence or well-being is at risk from abuse, neglect or self-neglect.
- **Abuse** – Maltreatment by physical, emotional or sexual means, or the failure to prevent such harm (see Appendix A1).
- **Neglect** – Persistent failure to meet a learner's basic physical or psychological needs, likely to result in serious impairment of health or development (see Appendix A1).

- **Sexting** – The creation or sharing of sexual images, videos or messages by learners, regardless of age; responses vary by under-18 and adult contexts.
- **Child/Children** – Learners aged under 18 years.
- **Adult learner** – Learners aged 18 years and above.
- **Learner** – All learners over AND under 18 years.

These definitions ensure consistency across our procedures, training and records. All staff should use them when assessing concerns and completing referral records.

5. Over-18s Safeguarding

Our school/college recognises that learners aged 18 and over are legally adults with full rights to autonomy, privacy, and decision-making. Safeguarding responsibilities for these learners are governed by the *Social Services and Well-being (Wales) Act 2014* and must reflect their legal status, capacity, and individual needs.

Particular attention is given to learners with Additional Support Needs (ASNs), who may be more vulnerable to harm, exploitation, or neglect. Staff are trained to respond appropriately, uphold adult safeguarding thresholds, and ensure that learners are supported in a way that respects their rights, promotes wellbeing, and protects them from abuse. Staff are also competent adapting their safeguarding approaches to ensure the safety of our Over 18s learners, as in line with the Over 18s Safeguarding Procedure and Guidance set out in Appendix 9.

6. Roles and Responsibilities

Clear, shared accountability is essential for effective safeguarding. Every member of our community—from frontline staff to senior leaders understand their duties, know when and how to act, and work together to protect learners of all ages.

6.1 All Staff

All employees, volunteers and contractors play a frontline role in keeping learners safe. They:

- Remain vigilant for signs of abuse or neglect in learners under 18 and over 18 years
- Follow this policy and the Over-18s Safeguarding Procedure (Appendix 9).
- Record concerns promptly and accurately
- Report immediately to the DSP or to the Headteacher/Principal if neither is available.
- Maintain confidentiality by sharing information only on a “need-to-know” basis.

6.2 Designated Safeguarding Person (DSP) & Deputies

The DSP (and deputies) coordinate child-safeguarding across the institution. Key responsibilities include:

- Leading on all child-protection referrals to Children’s Services, Channel or police.
- Managing and monitoring safeguarding records, ensuring accuracy and timeliness.

- Advising and supporting staff on safeguarding concerns and early-help interventions.
- Chairing strategy discussions and attending Child Protection Conferences.
- Ensuring all staff receive safeguarding induction and refresher training.
- Advising staff on capacity assessments, “vital interests” information-sharing and best-interest decisions regarding learners over 18 years
- Leading referrals under the Social Services & Well-being (Wales) Act 2014 to Adult Social Services or police for learners over 18 years
- Ensuring adult-safeguarding content is included in staff induction and ongoing training.

6.3 Headteacher/Principal

The Headteacher/Principal has overall accountability for safeguarding:

- Acts as Case Manager for all allegations against staff under both child and adult procedures.
- Ensures sufficient resources (time, staffing, budget) for DSP roles, training and external partnerships.
- Reviews termly safeguarding reports and performance metrics with the Proprietor.
- Promotes a culture of openness, encouraging staff to raise concerns without fear of reprisal.

6.4 Proprietor & Regional Lead

The Proprietor (or Regional Lead) provides strategic governance:

- Approves and signs off this policy and any major revisions.
- Monitors safeguarding compliance through quarterly audit reports and annual external reviews.
- Ensures coverage for DSP roles during absence or vacancies.
- Receives termly data on referral numbers, training completion rates and audit findings.

7. Recognising Abuse and Taking Action

Safeguarding begins with awareness. All staff are alert to indicators of harm—whether in children under 18 or adult learners—and know exactly how to respond. Early recognition and prompt alongside appropriate action can prevent escalation, protect individuals, and ensure timely support.

Appendix A1 sets out full categories of abuse and neglect; this section explains steps for every scenario. Please refer to the Child Protection Procedure (Appendix 5 & 6) and the Over 18s Safeguarding Procedure (Appendix 9) for further details.

7.1 Immediate Danger

Under 18

- If a child is in imminent risk of significant harm, call 999 first and then children's social services
- Inform the DSP within one hour and record all details by the day's end.
- Follow the Child Protection Procedure (Appendix 5 & 6)

18 and over

- If an adult learner is in imminent risk of significant harm, call 999 and then the Adult Social Services safeguarding team
- Notify the DSP within one hour and log the incident by the day's end.
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

7.2 Disclosure by Learners

Under 18

- Listen calmly, using the learner's own words. Do not promise confidentiality; explain you must share to keep them safe
- Record as soon as possible, including date, time and context
- Refer to the DSP within one hour.
- Follow the Child Protection Procedure (Appendix 5 & 6)

18 and over

- If the learner has capacity, respect their choices but explain any duty to report serious risks
- If lacking capacity or at serious risk, record their words, note capacity concerns, and refer to the DSP immediately.
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

7.3 Female Genital Mutilation (See Appendix 2)

Under 18 –

- Teachers must **personally report** suspected FGM to police (101) immediately, then inform the DSP.
- Follow the Child Protection Procedure (Appendix 5 & 6)

18 and over

- DSP reports to Adult Social Services and police
- Records all referrals and follows local FGM protocols.
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

7.4 Preventing Radicalisation (See Appendix 2)

Under 18

- Spot signs outlined in Appendix 2
- Discuss with the DSP within 24 hours; DSP uses the WRAP toolkit and refers to Channel if needed.
- Follow the Child Protection Procedure (Appendix 5 & 6)
- Staff refer to the Preventing Extremism and Radicalisation Policy

18 and over

- Note behavioural or online risks; report to the DSP
- DSP assesses under the Prevent Duty for adults and refers to Channel or Adult Social Services as appropriate.
- Staff refer to the Preventing Extremism and Radicalisation Policy
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

7.5 Mental Health Concerns

Under 18

- Self-harm or suicidal ideation triggers immediate-danger steps (see 7.1).
- Other concerns go to the pastoral lead, with DSP oversight and fortnightly review
- Follow the Child Protection Procedure (Appendix 5 & 6)

18 and over

- With consent from the learner the DSP refers to Adult Mental Health services or other support services
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

7.6 Low-Level Concerns About Staff (See Appendix 7)

- Staff report any non-threshold concern (boundary blur, inappropriate language, minor policy breach) to the Headteacher/Principal and DSP.
- The Headteacher refers to the Low-Level Concerns Procedure (Appendix 7) and if required the Child Protection Procedure (Appendix 5 & 6) or Over 18s Safeguarding Procedure (Appendix 9).

7.7 Learner on Learner Abuse (Peer Abuse) (See Appendix 2)

Under 18

- Treat all allegations as a safeguarding matter, not behavioural issues
- Separate parties
- record
- refer to the DSP within one hour.
- DSP leads a risk assessment and weekly review.
- DSP refers to the Child Protection Procedure (Appendix 6)

18 and over

- Staff refer to the DSP as in line with Over 18s Safeguarding Procedure (Appendix 9).
- DSP conducts a risk assessment and involves Adult Social Services or police if required as in line with the Over 18s safeguarding procedure (Appendix 9).
- DSP leads a risk assessment and weekly review.

7.8 Sharing of Nudes & Semi-Nudes (“Sexting”) (See Appendix 2)

Under 18

- Staff must not view or forward images
- Staff report immediately to the DSP, who completes an Initial Review within two hours and decides if any images must be viewed (DSP only)
- DSP refers to children’s social care or police if criminal.
- DSP reviews up at one weekly and then monthly intervals.
- DSP refers to the Child Protection Procedure (Appendix 5 & 6)

18 and over

- Staff report to the DSP, who assesses consent and coercion
- DSP involves police if the activity is non-consensual
- Learner is referred (with consent) to appropriate support services and is offered digital-safety education
- DSP records all details
- Refer to the Over 18s Safeguarding Procedure (Appendix 9)

8. Curriculum & Safeguarding Education

Educating learners about safeguarding is fundamental to preventing harm and building resilience. We integrate safeguarding themes throughout our curriculum, ensuring that every learner—whether under 18 or aged 18 and above—develops the knowledge, skills and confidence to recognise risks, seek help and support peers. This proactive approach complements reactive procedures by creating a culture of awareness and shared responsibility.

For learners under 18, safeguarding education is delivered through our PSD Personal and social development programmes, tutor time activities and dedicated assemblies.

Adult learners receive tailored safeguarding sessions during induction and through ongoing professional-development workshops.

9. Learner Voice & Participation

Empowering learners to shape our safeguarding culture is vital. When learners feel heard and see their input translated into action, they gain confidence to raise concerns and participate in solutions. We provide structured and online forums to enable learners to discuss emerging issues, review reporting processes and propose improvements.

10. Parental & Next-of-Kin Engagement

Timely communication with parents, carers or next-of-kin is a vital element of a robust safeguarding response. Building trust through transparent dialogue helps families understand concerns, participate in support plans, and contributes to a unified partnership in protecting every learner—whether they are under 18 or adults aged 18 and above.

10.1 Under-18 Learners (See Appendix 5, 6 & 8)

When a safeguarding concern arises for a learner under 18, our default position is to inform parents or carers unless doing so would increase risk. Early parental engagement:

- Demonstrates respect and promotes co-operation in protection plans
- Enables families to provide critical background information
- Meets our duty under the Children Act 1989 to involve parents in safeguarding decisions

Staff must:

- Consult the DSP before contacting parents to agree timing and content
- Use clear, non-judgmental language and focus on safety and wellbeing (see Appendix 8)
- Record the date, time, method and summary of the conversation

Exceptions (no parental contact):

- Concerns that contacting parents may endanger the child
- Advice from Children's Services or police to delay notification

10.2 Adult Learners (Over 18s) (See Appendix 9)

Adult learners generally have the right to manage information about their own welfare. We respect this autonomy by:

- Seeking the learner's consent before involving next-of-kin
- Explaining the benefits of family involvement in support and recovery
- Documenting their decision and rationale

If an adult learner lacks capacity or poses an imminent and significant risk or harm to self or others, staff should:

1. Invoke the Mental Capacity Act 2005 "best-interests" principle
2. Share relevant information under GDPR "vital interests" with next-of-kin
3. Record capacity assessment, consultation process and decisions

11. Supporting Learners with Additional Learning Needs

Learners with additional learning needs (ALN) may be more vulnerable to harm or may face barriers when disclosing concerns. Our duty is to provide inclusive, accessible safeguarding processes that recognise communication differences, cognitive challenges and sensory needs, whether the learner is under 18 or an adult with disabilities. By tailoring our

approach, we remove obstacles to reporting and ensure every learner can engage fully with our safeguarding system.

Under the Special Educational Needs and Disability (SEND) Code of Practice (2015) and the Social Services & Well-being (Wales) Act 2014, we make “reasonable adjustments” to procedures, environments and materials. This includes Easy-Read guides, symbol-supported forms, additional time and specialist support.

11.1 Identifying and Responding to ALN Needs

- **Screen for barriers:** At induction, collect information on communication needs, cognitive level and sensory sensitivities via enrolment forms **Accessible reporting:** Offer multiple reporting formats—verbal, written, pictorial and video—so learners choose the method that suits them.
- **Extended interview time:** Allow ALN learners extra time and breaks during disclosures to reduce anxiety and ensure understanding.
- **Supportive environment:** Conduct meetings in a familiar, quiet room with minimal distractions; permit a trusted support person to be present.

12. Safeguarding Learners with a Social Worker

Learners who are known to children’s or adult social care often face complex, overlapping vulnerabilities. Whether a child under a child-protection plan or an adult receiving social-care support, seamless coordination between our institution and statutory partners is vital to maintain safety, promote stability and sustain learning engagement. This section outlines how we collaborate with social workers and integrate their plans into our safeguarding framework.

Under both the Children Act 1989 and the Care Act 2014, social-care practitioners share responsibility with education settings for assessing risk, implementing protection plans and reviewing progress. Our DSP acts as the single point of contact, ensuring timely information exchange, co-planning and joint reviews.

12.1 Under-18 Learners

Children with a social worker include those on a child-protection plan, children in need, looked-after children and those subject to early-help support. Effective practice involves:

- **Information Sharing:** At admission, record the social worker’s name, contact details and the learner’s plan type (e.g., child-protection, CIN, LAC)
- **Personal Education Plan (PEP):** For looked-after children, convene a PEP meeting within 20 school days of placement and termly thereafter. The DSP chairs the meeting with the virtual school head, carer, social worker and family.
- **Joint Home Visits:** Where risk is elevated, arrange joint home visits with social workers to conduct safe-and-well checks and observe the learner’s environment.
- **Termly Safeguarding Reviews:** Integrate case reviews into the multi-agency cycle—DSP leads termly reviews with social care to update risk assessments and support strategies.

12.2 Adult Learners (Over 18s)

Adult learners under social-care support may include those with mental-health needs, self-neglect concerns or disabilities. Our ASL coordinates with the learner's care manager or safeguarding lead in Adult Social Services to:

- **Record Care Status:** At enrolment, note the care manager's details and existing care or safeguarding plan in the adult-safeguarding register.
- **Adult Safeguarding Plan:** Develop an individual support plan with ASL, social worker and learner, outlining risk factors, support contacts and review dates.
- **Joint Visits & Reviews:** Conduct joint welfare visits with the care manager when new risks emerge or every six weeks for high-risk cases. Convene multi-agency reviews quarterly to revise the safeguarding plan.
- **Capacity & Consent:** Before any joint meeting, confirm the learner's capacity; if capacity fluctuates, involve an Independent Mental Capacity Advocate (IMCA) and document decisions under MCA 2005.

13. Care-Experienced Learners & Care Leavers

Learners with care experience often carry complex emotional, social and practical needs arising from their backgrounds in foster care, residential care or kinship placements. Our dual focus on under-18 looked-after children and over-18 care leavers ensures continuity of support through critical transition points, reduces risk factors, and promotes stable educational engagement.

The School/College provides tailored safeguarding support for looked-after learners under 18 and care-experienced learners over 18, in line with Welsh Government guidance including *Keeping Learners Safe* and the Social Services and Well-being (Wales) Act 2014.

Under-18s - Personal Education Plans (PEPs) are convened within 20 school days of a learner becoming looked-after, as required by statutory guidance, and reviewed termly in line with best practice. The DSP chairs PEP meetings with the Virtual School Head, social worker, carers and learner to agree educational, emotional and social targets, with progress monitored regularly. A trained Designated Teacher ensures looked-after status is recorded and that attendance, attainment and wellbeing are reviewed monthly (best practice). Emotional support includes resilience workshops and peer mentoring for new arrivals.

Over 18 - the DSP liaises with the Leaving Care team to access pathway plans and statutory entitlements such as housing, bursaries and life-skills training. An induction meeting is held within 10 working days of enrolment (best practice) to agree safeguarding contacts, consent arrangements and grievance routes. Each learner is assigned a mentor for fortnightly check-ins during their first term, with access to financial advice, mental health support and youth services. Multi-agency safeguarding reviews are convened every 12 weeks (best practice) to update adult safeguarding plans in response to emerging risks such as housing instability, financial exploitation or self-neglect.

14. Online Safety & Mobile Device Use (See Appendix 4, 5 & 6)

Online safety is a core component of our safeguarding strategy. All online risks—whether related to content, contact, conduct or commerce—are managed in accordance with Section 7 and Appendix 4, 5 & 6 of this policy.

Our school/college is aware of the immense learning opportunities the digital world offers but is also equally aware of the potential risks it poses such as inappropriate content, cyber-bullying, grooming and fraud. We must equip every learner—whether under 18 or adult—to navigate technology safely, and ensure our networks and devices are protected by robust technical controls.

14.1 Technical Safeguards

Filtering & Monitoring

Under 18

- Real-time content filtering blocks adult, extremist or self-harm sites
- logs are reviewed weekly by the online-safety lead.

Over 18

- Customised adult filtering focuses on GDPR-compliant data privacy; alerts DSP when risky keywords or behaviours are detected.

Device Management

- School-issued devices are encrypted, licensed and managed centrally.
- BYOD (Bring Your Own Device): All users must register devices with IT, install the institution's mobile-device management (MDM) profile and agree to app-usage restrictions.

Network Security

- Secure Wi-Fi with individual credentials;
- guest network separated from learner data.
- Virtual Private Network (VPN) required for remote access to sensitive systems.

14.2 Education & Training

The curriculum teaches over and under 18s about topics such as online safety, privacy settings, identifying fake news and phishing awareness etc

Staff Development

All staff complete online-safety training via company online safety modules and face to face training.

14.3 Acceptable Use & Access

The Acceptable Use Agreement (AUA)

- Is signed by all learners and staff yearly and covers areas such as device usage, social-media conduct and password management
- There are Separate AUAs for under-18s (parental signature required) and adult learners.

Account Provisioning

- Unique user accounts; two-factor authentication mandatory for administrative access.
- Guest accounts monitored and terminated after inactivity.

15. Missing & Absent From Education (See Appendix 3)

Repeated or prolonged absence can indicate that a learner—child or adult—is at risk of harm, exploitation or disengagement. Our proactive monitoring and rapid-response protocols ensure we locate missing learners quickly, assess their welfare, and re-engage them in learning safely. This applies whether the learner is under 18 (Children Missing Education) or an adult learner whose absence may signal a safeguarding concern.

Schools and colleges have a statutory duty to notify the local authority of children missing education (Education Act 2002) and to safeguard adults under the Care Act 2014. By combining real-time attendance dashboards with clear escalation pathways, we minimise risk and deliver timely support.

15.1 Attendance Monitoring & Early Warning

Daily Registers

- All teaching and support staff must take registers at the start of every session.
- Instant alerts for unexplained absences are sent to the attendance officer.
- Attendance Dashboard

Under 18

- Flags unauthorised absence over two consecutive days or patterns of partial attendance

Over 18

- Highlights absence of vulnerable adults—those with known safeguarding plans or social-care involvement

- DSP receives daily summaries and reviews by 10 am.

Trigger Indicators

- Sudden drop in attendance percentage
- Repeated late arrivals or unexplained early departures
- Avoidance of particular classes, staff or campus areas

15.2 Risk Matrix & Escalation

Absence Duration	Under-18 Action	18+ Action	Responsible Lead
1–2 days unexplained	Phone call; welfare check; log outcome	Phone call; confirm learner wellbeing	DSP
3–5 days unexplained	Pastoral home visit; escalate to DSP if no contact	Home-visit referral to Adult Social Services	Pastoral Lead / DSP
6–9 days unexplained	Convene safeguarding meeting; consider CME referral	Multi-agency review; mental-health check-in	DSP
10 days consecutive	Formal CME referral; safe-and-well by local authority	Adult Services safeguarding referral; crisis team alert	DSP / ASL

15.3 Welfare Follow-Up & Re-Engagement

- **Immediate Contact Attempts** Record every call, text, email or home-visit attempt noting date, time and outcome.
- **Safe-and-Well Visits** Coordinate with local authority (children’s or adult services) to conduct a face-to-face welfare check when absence reaches day 10.
- **Digital Footprint Review** In collaboration with the online-safety lead, review social-media and learning-platform activity for signs of exploitation or distress.
- **Return-to-Learn Meeting** On re-engagement, hold a structured meeting to discuss reasons for absence and any safeguarding concerns. Agree a support plan—timetable adjustments, mentoring, counselling. Schedule follow-up reviews at one and four weeks to monitor progress.

15.4 Remote & Blended Learning Protocols

Delivering education online introduces unique safeguarding considerations. Whether learners join live lessons from home or access blended content asynchronously, we must protect their welfare, privacy and digital safety. This section defines the protocols for remote delivery, ensuring consistent standards for learners under 18 and over 18 years.

15.5 Approved Platforms & Access

Under 18

- Use only school-approved platforms (Microsoft Teams, Google Classroom) with managed accounts
- Two-adult rule for live lessons: at least two staff present on screen or in the room
- Waiting rooms enabled; admit learners one at a time against register.

Over 18

- Use only approved platforms with individual login credentials and two-factor authentication
- One-to-one tutorials permitted if learner gives informed, recorded consent.
- VPN required for any access to learner data or internal systems.

15.6 Pre-Session Safeguards

- Confirm session timetable and attendees against the register at least 30 minutes prior.
- Send code-of-conduct reminder in writing:
- Cameras on at learner's discretion (under-18s must keep on unless parental permission).
- Professional attire and neutral background required.
- No recording or screenshotting by learners.
- Ensure technical support is available for connectivity or access issues.

15.7 Live Session Conduct

Under 18 Learners

Tutor records session start/end time.

No private breakout rooms unless observed.

Immediate chat function monitored by staff.

Any safeguarding concern raised verbally triggers offline follow-up.

Over 18 Learners

Tutor may record with learner consent.

Breakout rooms allowed with second staff member.

Chat transcripts monitored and stored.

Flags in chat or during live session trigger ASL referral.

- Staff must keep a log of any safeguarding concern raised during the session.



- All live sessions must include a brief “housekeeping” slide on reporting concerns and support contacts.

15.8 Post-Session Review & Data Retention

- Attendance and engagement logs exported within 24 hours and stored securely.
- Chat logs and recording files (if any) retained for 30 days unless needed for an investigation.
- Transcripts of flagged chat messages or concerns transferred recorded
- Weekly check by the online-safety lead and DSP to identify any emerging patterns of risk.

16. Safer Recruitment & Staff Training

Robust recruitment and continual training are foundational to a vigilant safeguarding culture. Every member of staff—employees, governors, volunteers and contractors—must be vetted, inducted and supported with up-to-date safeguarding knowledge, whether they work with under-18s or adult learners.

Staff refer to our Recruitment and Selection Policy for further guidance.

17. Managing Allegations Against Staff, Volunteers & Contractors

(See Appendix 5 & 6)

Allegations that any adult working with learners may have:

- Behaved in a way that has harmed or may harm a learner
- Possibly committed a criminal offence against or related to a learner
- Behaved towards a learner in a way that indicates they are unsuitable to work with children or adults at risk

Our procedures ensure prompt, fair and transparent handling of all concerns, distinguishing between low-level issues (see Section 7.6 and Appendix 7) and those meeting the harm threshold.

17.1 Signs a staff member could be causing harm to a learner

- Using restraint when it's not needed
- Finding ways to spend time with an individual perhaps by working longer hours
- Finding ways to spend time alone with a particular individual
- Giving treats, presents or money to individuals without permission from manager
- Inviting an individual to their own house without permission from a manager
- Being over-friendly with certain individuals, parents or guardians
- Taking photos of individuals that aren't for work purposes
- Trying to make private contact with an individual by text, email, mobile phone, online or in letter
- Finding ways to have physical contact, like play-fighting or tickling

- Keeping collections of toys or other items that might attract children or people at risk
- Controlling behaviour
- Narcissistic characteristics
- Bullying
- Having favourites
- Humiliation
- Constant yelling and shouting
- The threat or use of violence
- Destroying personal items
- Accusing the learner of committing abuse against them

17.2 Under-18 Allegations (See Appendix 5 & 6 - Child Protection Procedure)

Threshold for Referral

- Harm threshold reached if there is reasonable cause to suspect abuse or neglect of a child by a member of staff
- Low-level concerns (e.g. lapse in professional judgment) recorded under the Staff Code of Conduct but do not trigger SOPA referral.

Reporting & Referral

1. Report immediately to the Headteacher/Principal and DSP.
2. Headteacher/Principal liaises with the Single Point of Access within the Local Authority area (SPOA) within one working day if required and follows the Child Protection Procedure (Appendix 5 & 6).
3. Follow SPOA advice on investigation scope, timescales and record-keeping.

Investigation & Support

- Alleged perpetrator informed of process, provided written summary of allegations and offered support.
- Suspension only if risk assessment indicates threat to learners or investigation integrity.
- Maintain confidentiality; share updates with staff on a need-to-know basis.

Outcome & Record

- Record outcome categories: substantiated; unsubstantiated; unfounded; malicious
- Retain papers securely on personnel file in line with archiving regulations.
- Share lessons learned via termly safeguarding roundtables.
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17.3 Over 18 years Allegations

Threshold for Referral

- Abuse or neglect of an adult learner by staff, including sexual, financial or discriminatory harm.

Reporting & Referral

1. Staff report concerns immediately to the Headteacher/Principal and DSP.
2. DSP assesses whether to refer to Adult Social Services or the police in line with the Care Act “safeguarding adults” duty and Over 18s Safeguarding Procedure (Appendix 9).
3. Notify HR and professional regulators if misconduct or fitness-to-practise issues arise.

Investigation & Support

- DSP convenes a Strategy Meeting within five working days with Adult Services and police if needed
- Offer both the alleged victim and the accused access to support services and legal advice

Outcome & Record

- Log investigation outcome
- Comply with data-protection requirements when sharing outcomes with next-of-kin or regulators
- Include anonymised case reviews in the annual safeguarding report.

18. Off-Site Visits & Educational Activities

Safeguarding extends beyond campus walls. Whether a day trip, residential visit or adventure activity, we must uphold our duty of care for learners under 18 and adult learners alike. Our Educational Visits Policy outlines the planning, approval and on-trip protocols to ensure safety, consistency and clear lines of accountability.

19. Whistleblowing & Complaints Procedures

Safe cultures depend on transparent routes for raising concerns—whether about malpractice, policy breaches or poor practice—without fear of reprisal. Staff refer to our Whistleblowing Policy for guidance on the protocol to raise concerns about fellow staff and management.

20. Mind of My Own (where applicable)

Mind of My Own is available to support all students (where appropriate) in the day school sector across Care Tech services. This is used via an app or computer log in and enables a student’s views, wishes and feelings to be shared digitally as well as, or, instead of verbally.

To access Mind of My Own, learners set up their own account and this is supported by the use of staff 'Practitioner Accounts'.

Mind of my own is not an emergency service and should a concern arise staff need to follow the reporting in this policy and should not rely on the app to perform this role.

Regarding safeguarding, students have the opportunity to raise concerns if they wish. More specifically the One App has a function called 'Safety Link' which is triggered if a learner mentions or chooses the words 'unsafe', 'scared' or 'unhappy'. Portal admins are instantly notified of such statements, which then provides opportunity to discuss directly with the learner when they next meet. As already mentioned above if learners raise any safeguarding concerns, this information is treated exactly the same as any other safeguarding concern and reported as per the procedures within this policy.

Mind of My Own enhances our ability to hear and listen to a learner's voice and does not replace any existing methods that are already working for our students. All we know is that sometimes even when we have a good positive relationship with a student they can find it difficult to share their true thoughts, feelings and emotions. By sending a statement via Mind of My Own learners have the opportunity to share those thoughts, feelings and emotions without the need for face to face interaction and when they feel ready not when we are asking. Our learners also felt able to tell staff via Mind of My Own of their concerns if they did not feel comfortable talking face to face.

21. Residential Homes attached to Schools/Colleges

Staff working in residential homes follow the home's policy when a Safeguarding concern arises and not the school policy. Communication is strong between the Registered/Homes Manager and the Responsible Individual for the home. This, in most cases is the Principal/Headteacher.

Staff in these homes are:

- alert to the extra vulnerabilities of ALN students
- alert to inappropriate student relationships and the potential for student-on-student abuse, particularly in schools and colleges where there are significantly more females than males or vice versa.
- vigilant in reporting inappropriate relationships or behaviours that are a cause for concern
- compliant with the additional safeguarding requirements relating to Regulated Services (Special School Residential Services) (Wales) Regulations 2023, Care Inspectorate Wales and the Regulation and Inspection of Social Care (Wales) Act 2016

More information regarding the ALN vulnerabilities of your students can be sourced from the Headteacher/Principal and must be clear throughout student's plans.

22. Confidentiality & Information Sharing



Safeguarding depends on sharing critical information at the right time with the right people. All staff must balance learners' right to privacy with our duty to protect them from harm. This section explains how and when to share information for learners under 18 and those 18 and over, ensuring compliance with legal frameworks and institutional protocols.

Effective information sharing:

- Builds trust with learners and families
- Enables timely multi-agency interventions
- Reduces duplication and gaps in support

22.1 Key Principles

- Share on a “need-to-know” basis only with colleagues directly involved in safeguarding or relevant external agencies.
- Never promise total secrecy. Explain to learners that serious concerns must be escalated.
- Record every decision to share—or withhold—information, including your rationale and who was informed.

22.2 Legal Frameworks

Learner Group	Legal Basis for Sharing	Consent Considerations
Under 18	Children Act 1989 – child’s welfare paramount;	Consent not required if risk of significant harm; parents informed unless this increases risk
18 and over	GDPR (vital interests) & MCA 2005 (best-interests)	Seek learner’s consent; if lacking capacity or at risk, share without consent under “vital interests” clause

22.3 When and With Whom to Share

- With your Designated Safeguarding Person (DSP)
- With statutory agencies: Children’s Services, Adult Social Services, police or Prevent/Channel teams.
- With health professionals and mental-health services when a medical or psychological assessment is needed.
- With parents/carers of children under 18 unless doing so places the learner at greater risk.
- With next-of-kin for adult learners, subject to capacity and consent considerations.

22.5 Common Pitfalls

- Withholding critical details “to protect confidentiality.” Any risk of serious harm overrides confidentiality.
- Over-sharing beyond those who need the information, leading to breaches of trust and data-protection violations.
- Failing to document verbal reports and decisions, creating gaps in the safeguarding record.

23.SUI Process

The Serious and Untoward Incident process (SUI) is an important component of the safeguarding process and must be completed where it is deemed necessary. A Serious and Untoward Incident is an event resulting in, or posing the risk of, significant harm, distress, or death. It could also have been a ‘near miss’ where an event could have led to a serious incident but was averted.

The SUI process is one which promotes the immediate safety of those harmed, allows for a timely investigation of the circumstances surrounding the incident, ensures post-incident actions are undertaken in addition to creating opportunities for review and evaluation.

Furthermore, the process enables serious incidents to be communicated to relevant heads of service about issues including potential financial risk (e.g. potential insurance claims), reputational risk (e.g. media coverage) in addition to alerting the Director of Safeguarding who upon receipt of the SUI form will provide guidance and support to schools throughout any child protection/safeguarding processes.

The SUI Reference Form outlines 5 risk categories that would merit the completion of an SUI Form. Staff refer to this for guidance about what incidents would require to be dealt with under the SUI process and ensure the form is completed within set timescales. Please refer to the SUI Reference Form and SUI Briefing Form links below for further guidance

[Insert Link for SUI Policy, SUI Reference Form and SUI Briefing Form](#)

20. Review History

October 2025

Appendix A1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events. In most cases, multiple issues overlap. These definitions apply to all learners—including those over 18; staff should consult the Over-18s Safeguarding Policy for adult-specific guidance where needed.

Physical Abuse

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a learner such as to cause severe and adverse effects on their emotional development. Emotional abuse may involve:

- Conveying that a learner is worthless, unloved, inadequate, or only valued for meeting another's needs
- Silencing or mocking a learner's attempts to express views or communicate
- Imposing age- or developmentally inappropriate expectations, including overprotection and preventing normal social interaction
- Exposing a learner to the ill-treatment of another person
- Serious bullying (including cyberbullying), exploitation or corruption

Sexual Abuse

Sexual abuse involves forcing or enticing a learner into sexual activities, whether or not they understand what is happening. Activities may include:

- Physical contact (assault by penetration; masturbation; kissing; rubbing; touching outside clothing)
- Non-contact activities (producing/viewing sexual images; sexual conversations by text; online grooming)
- Perpetration by adults or peers, male or female

Neglect

Neglect is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion or abandonment)
- Protect a learner from physical or emotional harm
- Ensure adequate supervision (including use of unsuitable caregivers)
- Ensure access to appropriate medical care or respond to emotional needs

Appendix A2: Specific Safeguarding Issues

This appendix follows Keeping Learners Safe 2022 guidance. All sections apply to learners under and over 18; for adult learners, staff also refer to the Over-18s Safeguarding Policy.

Criminal Exploitation

Abuse where power imbalances coerce or deceive a learner into criminal activity, in exchange for something they need or want, for perpetrator gain, and/or through violence or threats. It can be opportunistic or organised, a single event or ongoing, with or without physical contact, online or offline.

Indicators:

- Unexplained gifts or new possessions
- Associating with exploited peers
- Changes in emotional wellbeing
- Drug or alcohol misuse
- Periods of going missing or late returns
- Regularly missing lessons or disengaging from education

Action: Staff discuss concerns with the DSP. The DSP triggers local safeguarding procedures, including referral to social care and police as appropriate and in line with the Child Protection Procedure (Appendix 5 & 6) or Over 18s Safeguarding Procedure (Appendix 9).

Sexual Exploitation

Abuse where power is used to coerce or manipulate a learner into sexual activity for the learner's needs or perpetrator's advantage. It may involve contact or non-contact acts, offline or online, and can occur without the learner's immediate awareness when images are copied or shared.

Forms:

- Physical contact (penetrative; non-penetrative)
- Non-contact (sharing/viewing images; sexual conversations; webcam activities)

Additional Indicators:

- Having an older partner
- Suffering from STIs or unintended pregnancy

Action: Staff discuss concerns with the DSP. The DSP activates local procedures and refers to social care and police as needed and in line with the Child Protection Procedure (Appendix 6) or Over 18s Safeguarding Procedure (Appendix 9).

Modern Slavery and Human Trafficking

This constitutes slavery, servitude and forced or compulsory labour. Someone is in slavery if they are:

- Forced to work – through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.

Slavery takes various forms and affects people of all ages, gender and races. Individuals who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults who were promised paid work to be enslaved and forced to work and live in dehumanised conditions. This is in addition to adults with a learning difficulty who were restricted in their movements and threatened in order to hand over their finances and work for no gains.

For those under 18 years, the DSP immediately refers any suspected victim of modern slavery to the National Referral Mechanism (NRM) and to relevant agencies in line with the Child Protection Procedure (Appendix 6). For those over 18 years prior to making any referrals to the National Referral Mechanism, the DSP seeks consent from the learner. If consent is refused, the concern is reported via the 'Duty to Notify' process via the Home Office's online referral system.

Domestic Abuse

Learners may witness or be affected by domestic abuse between family members or partners (including teenage relationship or learner-to-parent violence). Exposure can have serious, long-lasting emotional and psychological effects.

Types:

- Intimate partner violence
- Abuse by relatives
- Teenage relationship abuse
- Learner-to-parent violence

Action: If police attend a domestic incident, they should inform the DSP. The DSP then provides support tailored to the learner's needs and records. If a learner makes a disclosure of domestic abuse the DSP refers as appropriate in line with the Child Protection Procedure (Appendix 6) or Over 18s Safeguarding Procedure (Appendix 9).

Homelessness

Being homeless or at risk of homelessness poses serious welfare risks. DSP deputies maintain housing authority contacts and raise concerns promptly in line with local protocols.

Honour-Based Abuse

Crimes to protect family/community “honour,” including FGM, forced marriage and practices like breast ironing. Often involves wider family pressure and multiple perpetrators.

Action: Staff alert the DSP, who activates local safeguarding procedures in line with the Child Protection Procedure (Appendix 6) or Over 18s Safeguarding Procedure (Appendix 9).

Female Genital Mutilation

Staff receive training to identify learners affected by or at risk of FGM. Procedures in Section 7.3 apply.

Indicators FGM has occurred:

- Learner or family disclosure
- Known to social care for safeguarding issues
- Difficulty walking, sitting or standing; discomfort
- Extended bathroom use; urinary/menstrual issues
- Avoidance of exercise or prolonged absence
- Increased emotional needs; reluctance for medical exams
- Asking for help without explicit detail; talking about pain

Risk Factors for FGM:

- Family history of FGM
- Community/country practice
- Family expressing concern FGM may occur
- Family not engaging with professionals
- Having a relative who underwent FGM
- Limited integration within UK society
- Confiding about a “special procedure” or trip abroad for becoming a woman
- Requesting help due to immediate FGM risk
- Talking about FGM in peer conversation
- Unexpected absence; missing child-health record sections; travel-clinic attendance

Forced Marriage

A marriage entered into without free consent, using violence, threats or coercion (physical, emotional or psychological). Staff are trained on the “one chance” rule for potential victims.

Action (Staff):

1. Speak privately with the learner about concerns
2. Report immediately to the DSP

Action (DSP):

- Speak privately with the learner
- Activate local procedures; refer to the designated officer
- Seek advice from Live Fear Free: 0808 80 10 800 or info@livefearfreehelpline.wales
- Refer to welfare officer, tutor, mentor or counsellor as appropriate

Preventing Radicalisation

Radicalisation is adopting extremist ideologies associated with terrorism. Extremism opposes fundamental British values; terrorism is violence or disruption intended to influence government or intimidate the public.

School/College Duties:

- DSP completes Prevent awareness training; staff access radicalisation-risk training
- Assess local risk with partners and police
- Maintain internet filtering; teach safe online habits
- Staff refer to the Preventing Extremism and Radicalisation Policy

Indicators (Educate Against Hate & NSPCC):

- Abusive refusal to engage with diverse peers
- Conspiracy beliefs; persecution feelings
- Friendship or appearance changes; new religion
- Isolation; scripted speech; unwillingness to discuss views
- Disrespectful or angry attitudes; secretive Internet use
- Sympathy for extremist ideologies; accessing extremist content
- Contact with recruiters; seeking to join extremist groups

Action: Follow Section 7.3 procedures; discuss concerns with the DSP. DSP refers to the Preventing Extremism and Radicalisation Policy alongside the Child Protection Procedure (Appendix 6) or Over 18s Safeguarding Procedure (Appendix 9 as required).

Learner-on-Learner Abuse (Peer Abuse/Mate Abuse)

Occurs when learners abuse peers inside, outside or online at School/College.

Forms Include:

- Bullying (cyber, discriminatory)
- Physical abuse (hitting, kicking, shaking, biting, hair pulling)
- Sexual violence (rape; assault by penetration; sexual assault)
- Sexual harassment (comments; jokes; online harassment)
- Coercing sexual activity without consent
- Sharing nudes/semi-nudes (sexting)
- Up-skirting (non-consensual under-clothes images)
- Initiation/hazing rituals (harassment or humiliation)

Online Peer Abuse:

- Harassing/misogynistic messages
- Non-consensual image sharing in chat groups
- Sending unwanted pornography

Action: Follow Section 7 (especially 7.7–7.8) procedures.

Sexual Violence & Harassment Between Learners

Can occur between any learners, in groups or individually, online or face-to-face. It exists on a continuum and may overlap.

Impact: Stress, distress, reduced educational attainment—worse if the alleged perpetrator attends the same institution.

At-Risk Groups: Females; learners with SEN/disabilities; LGBT learners.

Staff Must:

- Reassure victims they are taken seriously and kept safe
- Never blame or shame victims
- Challenge inappropriate or criminal physical behaviours (groping; lifting skirts; pulling down clothing)

Action: Follow Section 7 (especially 7.7–7.8) procedures.

Serious Violence

Involvement in or risk from serious violent crime can be indicated by:

- Increased absence
- New relationships with older individuals or groups
- Significant performance decline
- Self-harm signs or wellbeing changes
- Signs of assault or unexplained injuries
- Unexplained gifts or possessions (potential gang/criminal network links)

Risk Factors:

- Male gender
- Frequent absence or permanent exclusion
- History of maltreatment
- Previous offending (theft; robbery)

Action: Staff report concerns to the DSP. The DSP refers in line with the Child Protection Procedure (Appendix 6) or Over 18s Safeguarding Procedure (Appendix 9).

Appendix A3: Learners Missing from Education

A learner going missing from education—especially repeatedly—can signal safeguarding issues including abuse, exploitation, mental health concerns, substance misuse, radicalisation, FGM or forced marriage.

A3.1 At-Risk Circumstances

Learners at particular risk include those who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma or Traveller communities
- Are children of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend any school or college
- Come from new migrant families

A3.2 DSP & Staff Considerations

When a learner is absent, staff and the DSP consider:

- Missed-lesson patterns (subject or teacher)
- Site presence versus full absence
- Exploitation or caring responsibilities causing lateness
- Substance misuse impact
- Peers missing the same lessons (joint risks like sexual harm or gangs)
- Whether missed lessons would otherwise reveal injuries

A3.3 Single Missing Day

Staff review:

- Day-of-week patterns (e.g., before/after weekends)
- Links to specific lessons or staff
- Parent/carer notification timing for under-18s; self-notification for over 18s
- Confirmation of absence sent to under-18s' parents/carers
- Potential sexual exploitation or peer/staff abuse
- Parental awareness or condoning of absence
- Peer comments on whereabouts
- Direct contact with learner (over 18) or parent/carer (under 18)

A3.4 Continuous Missing Days

Staff check:

- Contact success with parent/carer (under 18) or learner (over 18)
- Medical evidence for ongoing absence
- Sibling attendance at this or other institutions
- Past concerns (radicalisation, FGM, forced marriage, honour-based abuse, exploitation)
- Any physical or sexual abuse indicators
- Learner safety if parent/carer has health needs
- Day 10 absence: inform Education Welfare Officer; complete “Missing Education” checklist

A3.5 Welfare Follow-Up & Safeguarding Response

Our School/College will:

- Conduct welfare calls, emails or agreed home-visits by pastoral staff
- Record all contact attempts; escalate concerns to the DSP
- Cooperate with local authority/police safe-and-well checks
- Review digital footprints (social media, gaming, encrypted messaging) with online-safety lead
- Treat repeated absence as both a safeguarding and educational issue
- Consider legal attendance action for under-18s and/or social care referral for any age
- Notify the local authority when a learner leaves without naming a new institution; follow admission-register rules

A3.6 Training & Referral

- Staff trained to recognise triggers (conflict-zone travel, FGM, forced marriage)
- If any staff member suspects a learner—under or over 18—is suffering or likely to suffer harm, they follow local Child-Protection or Over-18s Safeguarding procedures as appropriate
- Immediate referral to children’s/social care and police if a learner is in danger

Appendix A4: Online Safety

These measures apply to all learners, including those over 18; staff also refer to our Online Safety Policy, Child Protection or Over-18s Safeguarding procedures as needed.

A4.1 Four Key Risk Categories

- **Content:** exposure to pornography; fake news; racism; misogyny; self-harm; suicide content; anti-Semitism; radicalisation; extremism
- **Contact:** harmful interactions (peer pressure; advertising; grooming)

- **Conduct:** risky behaviours (sexting; sharing explicit content; cyber-bullying)
- **Commerce:** online gambling; inappropriate ads; phishing; financial scams

A4.2 Our Approach

- **Curriculum Education:**
 - Safe use of social media, internet and technology
 - Keeping personal information private
 - Recognising unacceptable online behaviour
 - Reporting cyber-bullying (as victim or witness)
- **Staff Training & Policies:**
 - Induction and annual refreshers on online risks (cyber-bullying; radicalisation)
 - Ongoing Safeguarding Network resources use
 - Awareness and integration of the Wales Safeguarding Procedures (to include the app)
 - Mobile/device rules: personal devices only during non-contact time; no learner photography on personal devices
- **Parental Engagement:**
 - Website guidance; direct communications; parents' evening briefings
 - Clear procedures for raising online-safety concerns
- **Technical Controls:**
 - Filtering; monitoring; managed access to maintain a safe digital environment

Appendix 5 - Child Protection Process – Staff sharing an allegation/concern

Immediately

- Staff to report allegation/concern to DSP or Deputy DSP
- Staff to ensure the child is kept safe from immediate danger/risk
- Staff to call police if child is in immediate danger
- If allegation/concern is about DSP, staff to report allegation/concern to Headteacher/Principal

Throughout the Process

- Staff to fully support any investigative processes by police/social services
- Staff keep the child's circumstances under review and report to DSP if concerns escalate
- Staff adhere to communication strategies outlined in policy



Appendix 6 - Child Protection Procedure - DSP/Headteacher/Principal dealing with allegation/concern



Earliest Opportunity/End of Working Day

- DSP completes SOPA/social services referral/notification form (if required)
- DSP informs Headteacher/Principal
- Headteacher/Principal informs HR (if required and allegation about staff)
- Headteacher/Principal considers whether SUI form required
- DSP considers Early Help, Pastoral Care etc

Within 24 hours

- DSP attempts to communicate with SOPA or social services about safeguards and whether s47 investigation is required
- Headteacher/Principal completes SUI - Section 1, 2 and 3 (if required)
- If appropriate DSP completes and records 'check in' with child
- DSP ensures actions to keep child safe have been implemented
- DSP/Headteacher/Principal takes advice from police and social services regarding their approaches towards management investigation
- Headteacher/Principal to consider referral to regulatory body

Within 5 days

- Headteacher/Principal commences Management Investigation (if appropriate and no S47)
- Headteacher/Principal consults HR if required
- If section 47 required -attempts to pursue agencies for potential investigation and facilitates meetings on-site if required

If a S47 remains ongoing

- DSP or Headteacher/Principal attempts to pursue agencies every 3-5 days for updates
- Headteacher/Principal informs SUI inbox and Regional Director of any significant updates

Within 30 days

- DSP or Headteacher/Principal attempts to pursue outcomes of any social services investigations
- Headteacher/Principal updates Regional Director with outcomes and lessons learned
- Headteacher/Principal updates Compliance & Regulation Team
- Headteacher/Principal sends email to Head of Quality and Head of Policy regarding any gaps in staff practice which will lead to a revision of policy

Upon conclusion of S47

- Headteacher/Principal updates Regional Director & Compliance and Regulation Team with outcomes and lessons learned
- DSP to communicate with identified staff to update the child's plans including risk assessments of children involved
- Headteacher/Principal to E-mail Head of Quality and Head of Policy of any gaps in practice
- Headteacher/Principal to inform DBS and regulatory body of any staff gross misconduct and the outcome of any disciplinary action
- If a member of staff leaves before completion of any disciplinary process the hearing will continue in their absence and DBS/regulatory body will be informed of outcome

Appendix 7 – Managing Low Level Concerns

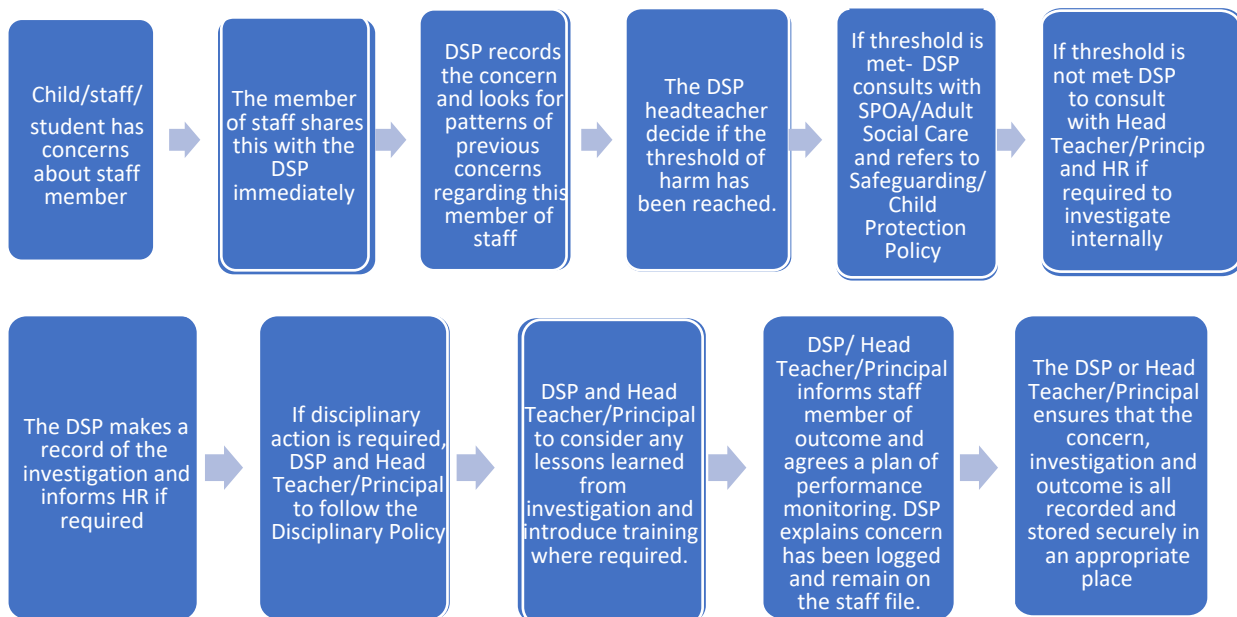
The term 'low-level' concern does not mean that it is insignificant. Low Level concerns are behaviours by adults that breach the staff code of conduct but do not meet the threshold for referral to the Single Point of Access (SOPA) or Adult Safeguarding Team. These may cause unease or arise from observation, disclosure, complaint or vetting checks. Examples include: over-familiarity, favouritism, inappropriate language, secluded one-to-one contact, or excessive social media use.

The DSP agrees the threshold with local safeguarding partners and reviews it annually. All concerns are reported to the DSP immediately, recorded within 24 hours, and reviewed with the Headteacher/Principal. Records include concern details, context, action taken, and reporter's name (anonymity respected where possible). A central register is maintained and retained for 10 years post-employment or until retirement.

The Headteacher/Principal is the final decision-maker. Concerns about supply staff or contractors are shared with their employers. If unsure, the DSP consults with the SOPA or Adult Social Care. Staff are encouraged to self-refer if they believe their behaviour may be misinterpreted. Self-referrals involving sexual behaviour, peer-on-peer abuse or online harm are treated with equal urgency.

Patterns of concern may trigger disciplinary action or referral. Wider cultural issues are considered, with policy updates or training delivered as needed. The DSP conducts annual audits of the record-keeping system.

Low Level Concerns Procedure



Appendix 8 – Staff initial response to Disclosures and Safeguarding Concerns

This policy guides staff in recording and reporting concerns swiftly to prevent further harm to the student.

Staff Must Not:

- Investigate or ask leading questions
- Make assumptions or offer alternative explanations
- Promise confidentiality—explain it will be shared on a ‘need to know’ basis
- Share information outside the reporting process
- Clean or disturb any area where an allegation occurred
- Encourage the student to wash, change clothes, clean teeth, or drink (in cases of sexual assault) to preserve forensic evidence

Staff Must:

- Stay calm and listen seriously
- Avoid shock, judgement, or emotional reactions
- Let the student speak freely; use TED questions (Tell, Explain, Describe)
- Reassure the student and explain next steps
- Record the disclosure immediately in the student’s own words, noting date, time, who was present, and any questions asked
- Report to the DSP immediately
- Contact police if the student is at risk of imminent significant harm
- Reassure the student they will be supported and kept safe
- Recognise that students may not disclose directly—maintain professional curiosity and speak to the DSP if concerned

Appendix 9 – Over 18s Safeguarding Procedure and Guidance

This appendix outlines safeguarding responsibilities for learners aged 18 and over, in accordance with the *Social Services and Well-being (Wales) Act 2014*, *Keeping Learners Safe*, and the *Additional Learning Needs and Education Tribunal (Wales) Act 2018*. It recognises the distinct legal status, rights, and vulnerabilities of adult learners, particularly those with Additional Support Needs (ASNs), who are care experienced and/or from a LGBTQ background.

An adult at risk is defined as someone who:

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

Learners with ASNs—including learning disabilities, neurodivergence, mental health conditions, or physical impairments—may be more vulnerable to harm due to:

- Communication barriers
- Dependency on others for care or advocacy
- Limited understanding of risk or exploitation
- Social isolation or reduced capacity to self-advocate

Staff Responsibilities

- All staff are trained to recognise adult-specific safeguarding risks, including coercion, financial abuse, domestic violence, self-neglect, and exploitation.
- Staff maintain professional curiosity and report concerns even if the learner does not disclose directly.
- The Designated Safeguarding Person (DSP) oversees all safeguarding matters involving learners over 18.

Consent and Capacity

- Adults have the right to make decisions unless assessed as lacking capacity under the *Mental Capacity Act 2005*.
- Where safeguarding concerns arise, staff consider the learner's capacity and involve the DSP and local safeguarding team to assess risk and determine next steps.
- Decisions made are in the learner's best interests when capacity is impaired.

Communication with Parents, Carers, and Support Networks

While learners aged 18 and over are legally adults, many continue to rely on parents, carers, or support workers for advocacy, care, and decision-making. The college recognises the importance of sensitive, lawful communication with these individuals, especially where learners have ASNs or are care-experienced.

- **Consent and Capacity:** Staff consider the learner's capacity to consent before sharing safeguarding information. If the learner lacks capacity, decisions about communication are made in their best interests, in line with the *Mental Capacity Act 2005*.



- **When Communication May Be Appropriate:**
 - The learner consents to parental/carer involvement
 - The learner is at risk of significant harm and parental/carer support is necessary to safeguard them
 - The learner has complex ASNs and relies on a carer or advocate for support
 - The learner is care-experienced and involved professionals (e.g. Leaving Care Team) need to be informed
- **When Communication May Be Withheld:**
 - The learner has capacity and refuses consent
 - Involving parents/carers may increase risk to the learner
 - The concern involves alleged abuse by a parent/carer
- **Professional Judgement:** Decisions about communication are made collaboratively by the DSP and Headteacher/Principal, with reference to safeguarding thresholds, learner wellbeing, and legal duties. Staff record the rationale for any decision to involve or exclude parents/carers.
- **Respect and Sensitivity:** All communication is handled with discretion, cultural awareness, and respect for the learner's autonomy. Where possible, learners are supported to participate in discussions about their safety and care.

Issues Requiring Differentiated Practice

Staff must approach the following areas with heightened sensitivity, legal awareness, and professional judgement when supporting learners over 18:

Mental Capacity and Decision-Making

- Assume capacity unless formally assessed otherwise.
- Capacity is decision-specific and may fluctuate over time.
- Use best-interest decision-making when capacity is lacking.
- Involve Independent Mental Capacity Advocates (IMCAs) where appropriate.
- Avoid making assumptions based on diagnosis or needs alone.
- Document all capacity assessments and decisions clearly.
- Support learners to make informed choices using accessible formats.

Consent and Information Sharing

- Adults have full rights under UK GDPR and the Data Protection Act.
- Seek informed consent before sharing personal or safeguarding information.
- Share without consent only if there's risk of serious harm or lack of capacity.
- Record all decisions and rationale for overriding consent.
- Use plain language when explaining consent and confidentiality.
- Consider the impact of sharing information on the learner's wellbeing.
- Involve the DSP in complex decisions about disclosure.

Sexual Health, Relationships, and Identity

- Respect adult learners' rights to engage in consensual relationships.



- Distinguish between safeguarding concerns and personal autonomy.
- Support learners exploring gender, sexuality, or cultural identity.
- Intervene only where there is evidence of coercion or exploitation.
- Provide access to sexual health education and resources.
- Be alert to signs of grooming or inappropriate power dynamics.
- Avoid judgement or bias in discussions about relationships.

Mental Health, Self-Harm, and Suicide Risk

- Escalate to mental health or emergency services if there is imminent danger.
- Recognise non-verbal indicators, especially in learners with ALNs.
- Use the Over 18s Safeguarding Procedure where adult risk thresholds are met.
- Avoid minimising or dismissing disclosures of distress.
- Encourage learners to access counselling or wellbeing services.
- Monitor changes in behaviour, attendance, or mood.
- Liaise with external mental health professionals when needed.

Substance Use and Harm Reduction

- Adults may legally use some substances; focus on safety and support.
- Refer to external services if use becomes harmful or exploitative.
- Avoid judgement; prioritise wellbeing and informed choices.
- Be aware of the impact of substance use on learning and relationships.
- Support learners to access harm reduction advice and treatment.
- Recognise signs of dependency or peer pressure.
- Consider safeguarding implications if substance use affects capacity or safety.

Financial Abuse and Coercion

- Be alert to unexplained debt, missing money, or undue influence.
- Learners with limited financial literacy or ALNs may be targeted.
- Refer to adult safeguarding teams where exploitation is suspected.
- Support learners to understand budgeting and financial rights.
- Watch for signs of pressure to share bank details or benefits.
- Involve advocacy services for learners with impaired capacity.
- Consider links to wider exploitation (e.g. criminal exploitation, modern slavery).

Work-Based Learning and Employer Safeguarding

- Ensure employers understand safeguarding responsibilities.
- Learners may face harassment or unsafe conditions in placements.
- Provide clear reporting routes and regular check-ins.
- Review employer policies and supervision arrangements.
- Support learners to recognise and report inappropriate behaviour.
- Monitor for signs of exploitation or overwork and escalate concerns to DSP .

Student Leadership and Peer Influence

- Provide training and supervision for learners in leadership roles.

- Monitor for power imbalances or inappropriate peer behaviour.
- Ensure safeguarding responsibilities are understood and upheld.
- Support peer mentors to maintain boundaries and confidentiality.
- Address concerns about peer pressure or exclusion.
- Encourage inclusive and respectful student leadership.
- Review safeguarding risks in peer-led activities or events.

Over 18s Safeguarding Procedure – Staff reporting a concern/allegation

Immediately

- Staff to report allegation/concern to DSP or Deputy DSP
- Staff to ensure the student is kept safe from immediate danger/risk
- Staff to call police if student is in immediate danger
- If allegation/concern is about DSP, staff to report allegation/concern to Headteacher/Principal

Throughout the Process

- Staff to fully support any investigative processes by police/adult social services
- Staff keep the student's circumstances under review and report to DSP if concerns escalate
- Staff adhere to communication strategies outlined in policy

DSP/Headteacher/Principal dealing with a concern/allegation



Earliest Opportunity/End of Working Day

- DSP completes adult safeguarding team/Adult social services referral/notification form (if required)
- DSP informs Headteacher/Principal
- Headteacher/Principal informs HR (if required and allegation about staff)
- Headteacher/Principal considers whether SUI form required
- DSP considers Early Intervention referral, Pastoral Care etc

Within 24 hours

- DSP attempts to communicate with Adult Safeguarding Team or adult social services about safeguards and whether s42 enquiry is required
- Headteacher/Principal completes SUI - Section 1, 2 and 3 (if required)
- If appropriate DSP completes and records 'check in' with student
- DSP ensures actions to keep student safe have been implemented
- DSP/Headteacher/Principal takes advice from police and adult social services regarding their approaches towards management investigation
- Headteacher/Principal to consider referral to regulatory body

Within 5 days

- Headteacher/Principal commences Management Investigation (if appropriate and no S42 enquiry required)
- Headteacher/Principal consults HR if required
- If section 42 enquiry required - DSP/Headteacher attempts to pursue agencies for potential investigation and facilitates meetings on-site if required

If a S47 remains ongoing

- DSP or Headteacher/Principal attempts to pursue agencies every 3-5 days for updates
- Headteacher/Principal informs SUI inbox and Regional Director of any significant updates

Within 30 days

- DSP or Headteacher/Principal attempts to pursue outcomes of any social services investigations
- Headteacher/Principal updates Regional Director with outcomes and lessons learned
- Headteacher/Principal updates Compliance & Regulation Team
- Headteacher/Principal sends email to Head of Quality and Head of Policy regarding any gaps in staff practice which will lead to a revision of policy

Upon conclusion of S47

- Headteacher/Principal updates Regional Director & Compliance and Regulation Team with outcomes and lessons learned
- DSP to communicate with identified staff to update the student's plans including risk assessments of students involved
- Headteacher/Principal to E-mail Head of Quality and Head of Policy of any gaps in practice
- Headteacher/Principal to inform DBS and regulatory body of any staff gross misconduct and the outcome of any disciplinary action
- If a member of staff leaves before completion of any disciplinary process the hearing will continue in their absence and DBS/regulatory body will be informed of outcome

