

Safeguarding Policy 2025-2026

Child Protection and Adults at Risk

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1 Statement of Intent

Leaders and managers are committed to safeguarding and promoting the physical, mental, and emotional welfare of every student, both inside and outside of SWRAC premises. We implement a whole-college preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear, consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Advisory Board, the Managing Director, staff, and visitors understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of abuse, and know how to refer concerns to the DSL.
- Teaching students how to keep safe, to recognise behaviour that is unacceptable and how to report concerns.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject, or identify people who might pose a risk to children or adults at risk.
- Ensuring that board members and all staff complete regular training in line with Keeping Children Safe in Education (KCSiE) requirements and recommendations.
- Ensuring that new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Appointing a Designated Safeguarding Lead (DSL) and Deputies (DDSL). Current DSL and DDSL names and photographs will be displayed in centres.

This policy applies to all students regardless of their age or the programme they are attending at SWRAC.

2 Legislation

This policy has regard to all relevant legislation, statutory and non-statutory guidance, see list at Appendix A.

2.1 Related policies

This policy operates in conjunction with the following policies and documents:

- Allegations of Abuse Against Staff Policy
- Anti-bullying Policy
- Behaviour and Exclusion Policy
- Data Protection Policy
- GDPR Policy

- Missing Students Policy
- Online Safety Policy
- Prevent Duty Policy
- Safeguarding Guidance for Staff
- Safeguarding Guidance for Students
- Safer Recruitment Policy
- Staff Code of Conduct
- Staff Disqualification Declaration Form
- Whistleblowing Policy

3 Roles and responsibilities

3.1 Staff responsibilities, to:

- Consider, always, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be able and prepared to identify students who may benefit from early help.
- Be aware of systems which support safeguarding, including any policies, procedures, information, and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training during their induction. Receive and understand safeguarding, child protection, and adults at risk updates, for example, via email, as required, and at least annually.
- Be aware of the local early help process for children and understand their role in it.
- Make a referral to CSCS or ASC and/or the police immediately, if at any point there is a risk of immediate serious harm to a student.
- Be aware of and understand the procedure to follow if a student confides they are being abused, exploited, or neglected.
- Be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all students feel safe, listened to, and understood.
- Empower students and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues and local threats that can put students at risk of harm.

- Be aware of behaviours that could potentially be a sign that a student may be at risk of harm.

If a member of staff has any concern about a student's welfare, or a student has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

3.2 Advisory Board Members have a duty to:

- Take strategic leadership responsibility for safeguarding arrangements.
- Ensure an Advisory Board member and Managing Director takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SMT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-college approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensure that the organisation complies with its duties under the above child/adult protection and safeguarding legislation.
- Ensure that the policies, procedures, and training opportunities for staff are effective and always comply with the law.
- Ensure that managers and staff contribute to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'. Confirm safeguarding arrangements consider the procedures and practices of the Local Authority as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the policies and procedures. That they meet obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff read Part one of KCSIE annually and Making Safeguarding Personal.
- Ensure systems are in place, to allow students to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure when recruiting staff and volunteers that safer recruitment procedures are followed.

- Ensure that all board members receive appropriate safeguarding adults and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to manage allegations against staff, supply staff, volunteers, and contractors. Ensure that the chair of the advisory board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Managing Director or another governor.
- Confirm that there are procedures in place to make a referral to Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Ensure an early help procedure is in place and ensure all staff understand the procedure and their role in it.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep Looked After Children (LAC) and care leavers are safe, particularly about the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect, or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the advisory board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR, and the local multi-agency safeguarding arrangements.

3.3 Managing Director has a duty to:

- Ensure that the policies and procedures adopted by the advisory board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction and ensure they are readily accessible online.

3.4 DSL and DDSs, have a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, adult safeguarding and child protection matters. Act as a source of support, advice, and expertise for all staff.
- Take part in strategic discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.

- Be available during college hours for staff to discuss any safeguarding concerns. Ensure cover by a DDSL when absent.
- Arrange, with Centre Managers, adequate and appropriate cover for any activities outside of college hours or terms. Including the completion of risk assessments.
- Act as a point of contact with the safeguarding partners. Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Refer cases to:
 - CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - Police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Liaise with the Managing Director to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager/Managing Director and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Act in accordance with their role as the *Senior Mental Health Lead* and, where available, liaise with the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Managing Director and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement, and achievement. This includes:
 - Ensuring that relevant staff know which students have or had a social worker.
 - Understanding the academic progress and attainment of these students .
 - Maintaining a culture of high aspirations for these students .
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
 - Helping to promote positive educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers and the SMT.

- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether referrals have been made, and understand the purpose of this record-keeping.
Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new provision, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the Safeguarding Policy and procedures – this will be discussed during the staff induction and meetings.
- Work with the advisory board to ensure Safeguarding Policy is reviewed annually or when legislation is changed.
- Ensure the Safeguarding Policy is available publicly, and parents/carers are aware of how to make referrals for suspected cases of abuse or neglect, as well as the role of the college.
- Undergo training and update training every two years.
- Encourage a culture of listening to students and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within the college, with other providers, with the safeguarding partners, other agencies, organisations, and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

Support the designated teacher has a responsibility for promoting the educational achievement of LAC/CIC and PLAC, and for children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

4 Multi-agency working

Leaders and managers will be fully engaged, involved, and included in the person-centred approach towards local safeguarding arrangements. Once named as a relevant agency by local safeguarding partners, staff will follow the statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

Staff will build trusting relationships between families and agencies to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to

provide additional support. Where a need for early help is identified, staff will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct or consider whether to conduct a section 17 or 47 assessment.

Staff will also be mindful of the importance of inter-agency working in identifying and preventing Child Sexual Exploitation.

Procedures will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on students' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging other's assumptions in a respectful manner.

4.1 Information sharing

Leaders and managers recognise the importance of proactive information sharing between professionals and local agencies to effectively meet students' needs and identify need for early help.

In considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on education to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes - data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Staff will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding. Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If staff members are in doubt about sharing information, DSL or deputy DSLs will provide guidance.

5 Early help for students at greater risk

The DSL will take the lead where early help is appropriate. Early help means providing support as soon as a problem emerges, at any point in a child's life. Staff will be proactive in ensuring that every student is able to access full-time education to aid their development and protect them from harm whilst using the unique position of having regular contact with students to identify concerns as early as possible. Any student may benefit from early help, but students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Identify as gender neutral, LGBTQ+ or are seen by others as being LGBTQ+
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.

- Are young carers, looked after children, children in care or leaving care. Including children recently returned home to their family from care.
- Children with social workers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, sexual or criminal exploitation or radicalisation.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of Honour Based Abuse (HBA), such as Female Genital Mutilation (FGM) or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from college.
- Have experienced bereavement.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Missing education, or are persistently absent from college, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Children's Social Care Services (CSCS) for assessment for statutory services if the student's situation is not improving or is worsening.

6 Specific safeguarding issues

Staff should be aware that there are certain specific safeguarding issues that can put students at risk.

Appendix B of this policy sets out details about specific safeguarding issues that students may experience and outlines actions that would be taken.

7 Context of safeguarding incidents

Safeguarding incidents can occur outside of college. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Staff will provide as much contextual information as possible when making referrals to CSCS.

8 Use of premises for non-college activities

Where the premises rented out or open to organisations or individuals, for example, for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep students safe. DSL will refer to the DfE's [guidance](#) on keeping children safe in out-of-educational settings in these circumstances.

When activities are provided under the direct supervision or management of college staff, safeguarding arrangements will apply. Where activities are provided separately by another body, staff authorising the activities will seek assurance that the organisation has appropriate safeguarding policies and procedures in place, including asking for evidence if needed. DSL will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

8.1 Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs such as, charities or companies, will work in collaboration with DSL to safeguard students and comply with safeguarding arrangements. Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities.

9 Alternative provision

Those responsible for the commissioning alternative provision will be aware that students often have complex needs – they will be mindful of the additional risk of harm that students attending may be vulnerable to. Staff will remain responsible for a student's welfare during their time at an alternative provider. When placing a student with an alternative provider, staff will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and ensure that the placement is meeting the student's needs.

10 Work experience

When a student is sent on work experience, staff will ensure that the provider has appropriate policies and procedures in place. Guidance will be provided to employers together with a named staff contact for any enquiries. Where external students conduct work experience at SWRAC, an enhanced DBS check will be obtained if the student is over the age of 16 and a risk assessment completed.

11 Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. When staff become aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct checks.

12 Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

The DSL and DDSs, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS/ASC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, to ensure the wellbeing of the students involved. The DSL will work closely with the police to ensure any criminal proceedings are not jeopardised, and to obtain help and support, as necessary.

Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Staff will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSCS/ASC. Where CSCS/ASC decide that a statutory investigation is not appropriate, DSL will consider referring the incident again if it is believed that the student is at risk of harm. Where CSCS/ASC decide that a statutory investigation is not appropriate and DSL agrees with this decision, further consideration of other support mechanisms, such as early help and pastoral support will be made.

At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so. For those students aged under 18 discussions of concerns with parents will only take place where this would not put the student or others at potential risk of harm. Staff will work closely with parents to ensure that the student, as well as their family, understands the arrangements in place, such as in-college interventions, is effectively supported, and knows where they can access additional support. For adults at risk will gain their consent to contact family or parents/carers.

13 Concerns about safeguarding practices

Any concerns regarding the safeguarding practices will be raised with the SMT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SMT, they can access the Chair of the Advisory Board or other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

14 Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with separate policy Allegations of Abuse Against Staff Policy.

15 Communication and confidentiality

DSL and DDSs will ensure when recording, holding, using, and sharing information they:

- Understand the importance of information sharing, both within the college and with other providers on transfer and with safeguarding partners, other agencies, organisations, and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Can keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

Where confidentiality or anonymity has been breached, managers will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised, and future breaches be prevented.

Where a student is leaving the college, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

16 Safer recruitment

Staff and volunteers will be appointed following the Safer Recruitment Policy.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The advisory board will ensure that the appropriate pre-employment checks are conducted for all prospective board members and staff, including internal candidates and candidates who have lived or worked outside the UK.

17 Single central record (SCR)

A SCR will be maintained with accurate and relevant information to record all staff, including agency and third-party supply staff, who work at SWRAC. This includes all members of the advisory body.

Information recorded meets the requirements of KCSiE and safer recruitment. Including:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18 or under 24 with EHCP
- A section 128 check for those in management positions, it is policy to complete a section 128 check on all staff, should a member of staff carry out management responsibilities or be promoted to a management position.

Checks will also be completed for agency and third-party supply staff. Records will include written confirmation from the employment business supplying the member of staff which indicates that all the necessary checks have been conducted (i.e. all the same checks SWRAC would complete) and the date that confirmation was received.

Checks conducted for volunteers, will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

The details of an individual will be archived once they no longer work at SWRAC.

18 Training

Staff members will undergo safeguarding, child protection and adult at risk training at induction, which will be updated on a yearly basis and/or whenever there is a change in legislation.

The induction training will cover:

- Safeguarding Policy .
- Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour and Exclusion Policy.
- The Missing Student Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection, adults at risk and safeguarding training, including online safety training - which, amongst other things, includes an understanding of expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive annual safeguarding updates or as required should legislation change. Training will cover, at a minimum:

- Issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep students at greater risk safe, early help.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements during meetings and reviews.

The DSL and deputy DSLs will undergo level 3, child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and students at greater risk.
- The importance of internal and external information sharing.

- The Prevent duty and local threats such as county lines.
- The risks associated with online safety, including the additional risks faced online by students with SEND.

19 Policy monitoring and review

This policy is reviewed at least annually or updated in line with changing legislation and safeguarding issues as they emerge and evolve. Any changes made to this policy will be approved by Advisory Board and communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is 1st September 2025.

Appendix A – Legislation and guidance

The safeguarding policy has considered the following legislation and guidance.

Legislation

- Anti-social Behaviour, Crime and Policing Act 2014
- Apprenticeships, Children and Learning Act 2009
- Children Act 1989
- Children Act 2004
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018
- Domestic Abuse Act 2021
- Equality Act 2010
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- General Data Protection Regulations 2018
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- The Care Act 2014 Care and Support Statutory Guidance (especially chapter 14) 2014
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The Human Rights Act 1998
- The UK General Data Protection Regulation (UK GDPR)
- Voyeurism (Offences) Act 2019

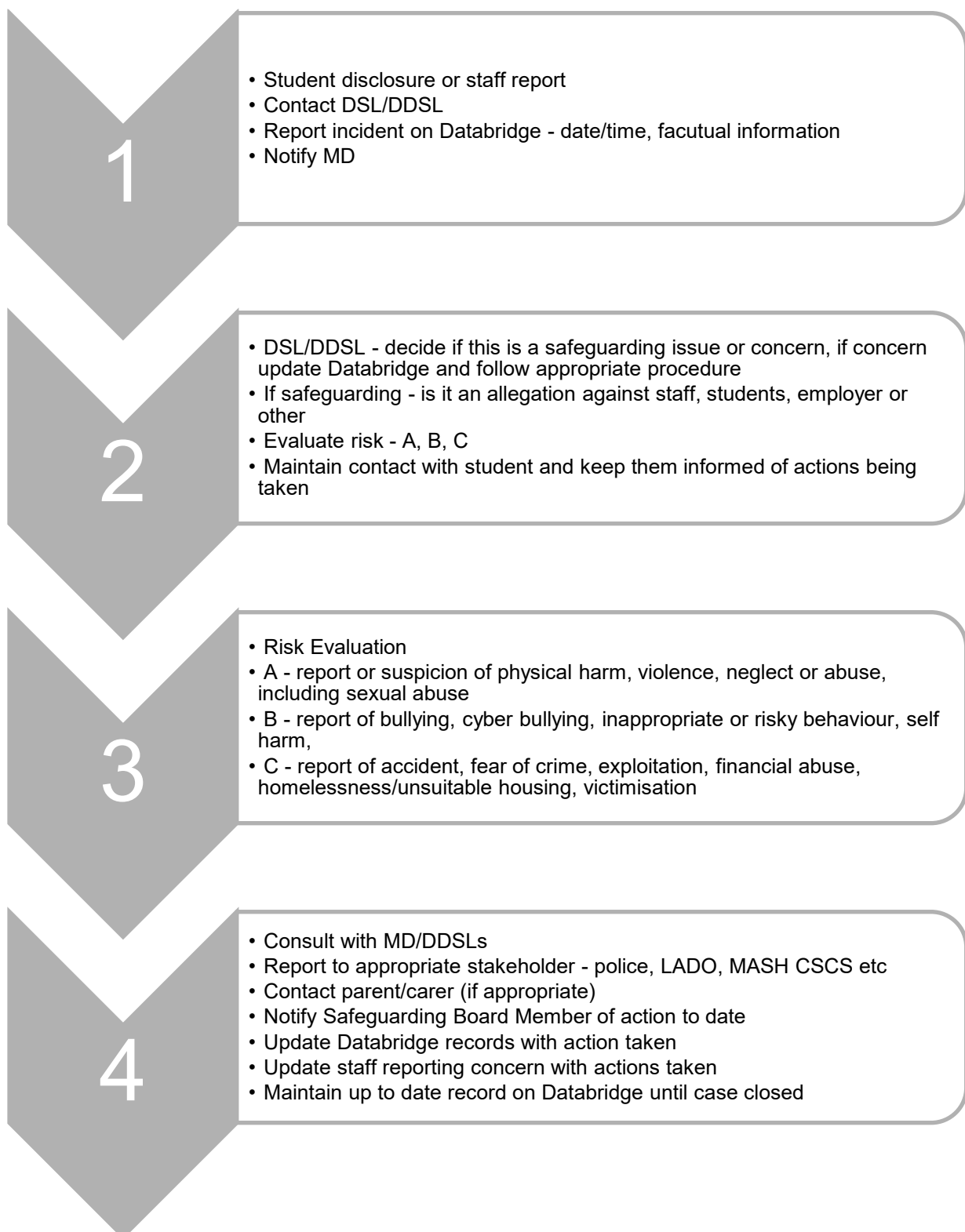
Statutory guidance

- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2024) 'Keeping children safe in education 2024'
- HM Government (2020) 'multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'.
- DfE (2015) 'What to do if you're worried a child is being abused'.
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'.
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'.
- DfE (2024) 'Working together to improve school attendance'.

Appendix B – Safeguarding Procedure



Appendix C - Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

Issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Students with family members in prison
14. Students required to give evidence in court
15. Mental health
16. Serious violence
17. Adult involvement in youth-produced sexual imagery

1 Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, for example, the person's child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Staff will recognise the impact of domestic abuse on children, as victims, if they see, hear, or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

2 Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to."

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

3 Children absent from education

A child who is absent from college can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. Staff will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of students becoming absent from education in the future. Staff will monitor students that are absent from the college, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Missing Student Policy. LA will be informed of any student who fails to attend regularly or has been absent without permission for a continuous period of 10 days or more.

SWRAC will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to college absences indicating safeguarding concerns.

3.1 Admissions register

Students are placed on the admissions register at the beginning of the first day that is agreed, or when notified that the student will first be attending. Staff will notify the LA when a student's name is added to the admissions register. The admissions register will be kept up-to-date and accurate at all times and staff will inform parents when any changes occur. Two emergency contacts will be recorded for each student where possible. Staff will monitor students who do not attend on the agreed date and will notify the LA at the earliest opportunity.

If a parent or young person notifies SWRAC that their child or they will live at a different address, the following information will be recorded on the admissions register:

- The full name of the parent with whom the student will live (if applicable)
- The new address
- The date from when the student will live at that address

If a parent or young person notifies staff that their child or themselves will be attending a different provision, or is already registered at a different provision, the following information will be recorded on the admissions register:

- The name of the new provision
- The date on which the student first attended, or is due to attend, that provision

Where a student moves to a new provision, staff will use a secure method to transfer students' data, if required to do so. To ensure accurate data is collected to allow effective safeguarding, the LA will be informed of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of SWRAC by their parents or decided to leave.
- Have ceased to attend SWRAC.
- Have been certified by a medical officer as unlikely to be in a fit state of health to attend.
- Have been in custody for a period of more than four months due to a final court order and staff do not believe they will be returning to SWRAC at the end of that period.
- Have been permanently excluded.

Staff will also remove a student from the admissions register when the student's whereabouts cannot be confirmed, after making reasonable enquiries into their attendance.

If a student is to be removed from the admissions register, staff will provide the LA with the following information:

- The full name of the student
- The full name and address of any parent with whom the student lives or the address of the young person.
- At least one telephone number of the parent with whom the student lives or a telephone number of an emergency contact.
- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable.
- The name of the student's new provision and the student's expected start date there, if applicable
- The grounds for removal from the admissions register

Staff will work with the LA to establish methods of enabling a student to return to college. SWRAC will highlight to the LA where they have been unable to obtain necessary information from parents, for example, where an address is unknown. Staff will also highlight any other necessary contextual information, including safeguarding concerns.

4 Child abduction and community safety incidents

For the purposes of this policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child

abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the college that may raise concerns regarding child abduction, for example, people loitering nearby or unknown adults talking with students.

Students will be provided with practical advice and information to ensure they can keep themselves safe outdoors, including how to identify a trusted adult or safe stranger.

5 Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis or drug factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

Staff will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Staff will also recognise that students of any gender are at risk of CCE.

Staff will be aware of the indicators that a student is the victim of CCE, including:

- Appearing with unexplained gifts, money, or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent or not taking part in sessions.

5.1 County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, staff will be aware of the specific indicators that a student may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, for example, knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owning a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

6 Cyber-crimes

For the purposes of this policy, "**cyber-crime**" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking.'
- Denial of Service attacks, known as 'booting.'
- Making, supplying, or obtaining malicious software, or 'malware,' for example, viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency's Cyber Choices programme.

7 Child sexual exploitation (CSE)

For the purposes of this policy, "**child sexual exploitation**" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

CSE can occur over time or be a one-off occurrence, and may happen without the student's immediate knowledge, for example, through others sharing videos or images of them on social media. Staff will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. Staff will also recognise that students may not realise they are being exploited, for example, they believe they are in a genuine romantic relationship.

Staff will be aware of the key indicators that a student is the victim of CSE, including:

- Appearing with unexplained gifts, money, or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent or not taking part in sessions.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the safeguarding procedure.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then manage the matter to conclusion. SWRAC will cooperate as needed.

8 Modern slavery

For the purposes of this policy, "**modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

9 FGM

For the purposes of this policy, "**FGM**" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a student being at risk of FGM or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police.

College procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman.'
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the student:

- Having difficulty walking, sitting, or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending lengthy periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from college, followed by withdrawal or depression.

- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **“honour-based’ abuse (HBA),”** which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

10 Virginitv testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to conduct, offer or aid and abet virginitv testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginitv testing - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, for example, surgery to address discomfort or menstrual complications.

Virginitv testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression, and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, for example, they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. Staff will educate students about the harms of these practices and dispel myths, for example, the belief that virginitv determines the worth of a woman, and establish an environment where students feel safe enough to make a disclosure.

Students aged 13 and older are most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability, or socioeconomic status. All staff will be aware of the following indicators that a student is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A student is known to have requested either procedure or asks for help
- Family members disclose that the student has already undergone the practices
- Pain and discomfort after the procedures, for example, difficulty in walking or sitting for a lengthy period which was not a problem previously
- Concern from family members that the student is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A student has already experienced or is at risk of other forms of HBA
- A student is already known to social services in relation to other safeguarding issues
- A student discloses other concerns that could be an indication of abuse, for example, they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A student displays signs of trauma and an increase in emotional and psychological needs, for example, withdrawal, anxiety, depression, or notable change in behaviour
- A student appears fearful of their family or a particular family member
- Unexplained absence from college, potentially to go abroad
- Changes in behaviour, for example, a deterioration in college work, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Staff will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the student, including expediting arrangements for the procedure.

11 Forced marriages

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual, and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the student:

- Being absent - particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming college holidays.
- Being subjected to surveillance by siblings or cousins at college.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from college by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, for example, to friends or on social media.
- Having a family history of forced marriage, for example, their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, for example, depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations, or motivation.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Managing Director and local safeguarding procedures will be followed - this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or Managing Director will ensure the student is spoken to privately about these concerns and further action taken as appropriate. Students will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the student's family or those with influence in the community, without the express consent of the student, as this will alert them to the concerns and may place the student in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among students .

If a student is being forced to marry, or is fearful of being forced to, staff will be especially vigilant for signs of mental health disorders and self-harm. The student will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage to respond to the victims needs at an early stage and be aware of the practical help they can offer, for example, referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage - staff will use existing national and local protocols for multi-agency liaison with police and children's social care.

Staff will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, for example, by preparing another reason for why the victim is seeking help.

Staff will establish where possible whether students at risk of forced marriage have a dual nationality or two passports.

Staff will aim to create an open environment where students feel comfortable and safe to discuss the problems they are facing - this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

Managers will take a whole company approach towards educating students on forced marriage in curriculum and environment - in particular, RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to students. Students will be encouraged to access appropriate advice, information, and support.

Teachers and other staff members will be educated through professional development about the issues surrounding forced marriage and the signs to look out for. DSL/DDSLs can provide guidance and information.

12 Radicalisation

For the purposes of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "**extremism**" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the

mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious, or ideological cause.

Protecting students from the risk of radicalisation is part of the wider safeguarding duties. Staff will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in students' behaviour which could indicate that they may need help or protection and use their professional judgement to identify students who may be susceptible to extremist ideologies and radicalisation and act appropriately. This may include contacting the DSL or making a Prevent referral. Staff will work with local safeguarding arrangements as appropriate.

Staff will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, staff will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student's parents, unless staff have reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation. The DSL will ensure training sessions are arranged for all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

12.1 Prevent Duty

Under section 26 of the Counterterrorism and Security Act 2015, all further education providers are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the wider safeguarding obligations.

SWRAC's procedures for conducting the Prevent duty, including how it will engage and implement the Channel programme, these are outlined in the Prevent Duty Policy.

13 Students with family members in prison

Students with a family member in prison will be offered pastoral support, as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

14 Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

15 Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems - SWRAC will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how students' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

Staff will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the Senior Mental Health Lead will be consulted.

16 Serious violence

Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from college.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A notable change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from college.
- Having been permanently excluded from college.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Staff will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

17 Adult involvement in youth-produced sexual imagery

Managers full response to youth-produced sexual imagery (YPSI) is outlined in the Youth-produced Sexual Imagery Policy.

17.1 Sexually motivated incidents

Staff will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult engages in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or extorted into sharing nude or semi-nude images, and/or further sexual activity.

17.2 Financially motivated incidents

Financially motivated incidents of YPSI involving adults may also be called “**sextortion**,” where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, for example, paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes to extort them.
- Use images that have been stolen from the child or young person, for example, via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.

- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked to obtain images, personal information, and contacts.
- Being extorted into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.