Safeguarding & PREVENT Policy 2026-27

Policy Details	
Policy Owner	Vice Principal Quality and Learner Journey and Designated Safeguarding Lead (DSL)
Date produced	August 2026 (October 2026 updated)
Approved by	Policies & Procedures Committee, USP College Corporation Board– to be ratified at Corporation 07 December 2026
Date approved	29 October 2026 (P&PC),
To be reviewed	Annually
Publication	MyUSP SharePoint Policies, USP College Website

1. Introduction and Purpose

1.1 Our Vision

a. USP College's vision is: "To help every learner gain the knowledge, creativity and skills to succeed in a changing world."

b. Our mission is: "Learning That Lasts. Ready for the Future."

c. Through its 2026–2031 Strategy, the College aims to provide an ambitious, student-focused learning experience that prepares every learner for their future. This includes developing their knowledge, creativity, confidence, adaptability, emotional intelligence and wider skills.

d. Career-focused learning remains an important part of our approach. Through strong relationships with employers, academic institutions and other strategic partners, we provide meaningful learning and work-related opportunities and clear pathways into employment, apprenticeships, further study and higher education.

e. Our work contributes to the College's four core strategic objectives:
   i. Strategic Partnerships: Enablers of Growth and Impact
   ii. Technology That Boosts Human Potential
   iii. Developing Future-Ready Learners and Adaptive Curriculum
   iv. Our People: Building an Agile, New Culture

1.2 Our Values and Behaviours

a. Respect
b. Accountability
c. Resilience

1.3 Our values are woven into every part of college life, from how we plan lessons to our expectations for student behaviour.

1.4 As a college, we promote open discussion around these three key areas so individuals can find what these mean to them and to demonstrate these within their everyday lives.

1.5 By demonstrating these values and behaviours we aim to create a productive working environment for staff and a positive learning environment for students, who are at the heart of the college.

2. Statement of Intent

2.1 The policy is intended to provide its staff with clear guidelines by which to discharge their responsibilities within the college's safeguarding duty. Helping to create an environment where students feel safe, valued and able to confidently report safeguarding concerns.

2.2 This policy applies to all staff, Governors, and volunteers working for USP College, as well as anyone working on behalf of the college, including contractors. It also applies to all learners, including full-time and part-time students, apprentices (both internal and external), and those engaged in subcontracted provision. This policy must be followed and promoted by everyone.

3. Safeguarding Children and Adults

3.1 The College recognises the distinction between:

a. child safeguarding and child protection arrangements for learners under 18 years of age;
b. adult safeguarding responsibilities for adults at risk;
c. Higher Education student welfare, harassment and sexual misconduct procedures.

3.2 Different statutory frameworks may apply depending on the age, status and circumstances of the individual concerned. The DSL will determine the appropriate safeguarding pathway and referral process.

3.3 The College recognises that the welfare of young people and adults at risk is paramount. The Children Act 2004 states that any individual under the age of 18 years, without exception, has the right to protection from abuse regardless of gender, ethnicity, disability, age, sexuality or beliefs. This right to protection extends to the siblings of students that are under 18 years of age.

3.4 It also extends to adults at risk defined as a person aged 18 years or over "Who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect themselves against significant harm or exploitation".

3.5 For students aged 18 and over, safeguarding concerns will be managed under relevant adult safeguarding procedures, Higher Education procedures where applicable, and the Care Act 2014 framework. An adult at risk is a person aged 18 or over who:

a. has needs for care and support;
b. is experiencing, or is at risk of, abuse or neglect; and
c. as a result of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it.

3.6 The College recognises that having a disability, learning difficulty, Education Health and Care Plan (EHCP), mental health condition or additional support need does not automatically mean that an individual is an adult at risk.

3.7 Safeguarding procedures for children under the age of 18 will always take precedence where a learner is legally a child.

3.8 Keeping Children Safe in Education (KCSIE) 2026 provides key information on safeguarding young people and promoting the welfare of all young people in education. This policy and associated procedures have been developed in line with the local safeguarding partnership procedures, Working Together to Safeguard Children (WTTSC) revised 2023 and KCSIE 2026. The latest guidance can be accessed directly here: Keeping children safe in education - GOV.UK and Working together to safeguard children - GOV.UK

3.9 The College is committed to the promotion and safeguarding of the welfare of its students and staff. This is a priority across all aspects of the college community, ensuring the provision of a safe and secure learning environment where students can succeed and all individuals feel secure.

3.10 For Higher Education (HE) students, the college complies with the Office for Students (OfS) Condition of Registration E6 regarding Harassment and Sexual Misconduct. The college is committed to taking steps that make a significant and credible difference in protecting HE students for sexual misconduct, hate crime, and harassment.

3.11 In accordance with the Office for Students (OfS) Condition E6, USP College provides a comprehensive source of information for Higher Education students through the MyUSP Safeguarding & Wellbeing Hub. This includes information relating to safeguarding, harassment, sexual misconduct, reporting mechanisms, support services, policies,

procedures, student rights, and sources of external support. The College will ensure this information is accessible, regularly reviewed and communicated to all Higher Education students.

3.12 Where reports of harassment or sexual misconduct are received involving Higher Education students, the College will ensure they are managed in a fair, transparent and trauma-informed manner. Informal resolution will only be considered where appropriate, genuinely voluntary and requested by the reporting student. Informal resolution will never be used where there is a significant safeguarding concern, criminal allegation, or where serious misconduct is alleged.

3.13 Where a report involves immediate risk, potential criminal conduct, safeguarding concerns relating to a child, concerns relating to an adult at risk, or a risk to other individuals, the College may take safeguarding, disciplinary or protective action regardless of whether the reporting student chooses to make a formal report. The wishes of the reporting individual will be taken into account wherever possible; however, safeguarding obligations may require information to be shared and action to be taken to protect individuals and the wider college community.

3.14 The College will:

a. Promote a culture of emotional safety, belonging and trusted relationships, ensuring students know who they can speak to, feel confident to report concerns, and receive timely support through the College's whole-college safeguarding approach

b. Identify students who are experiencing significant harm and provide support and take appropriate action where necessary as soon as problems emerge

c. Provide procedures for reporting such concerns and work in partnership with the appropriate agencies

d. Acknowledge that the term ‘safeguarding’ embraces both child protection and a preventative approach to keeping young people safe. This encompasses abuse, health and safety, bullying, honour-based abuse, meeting the needs of those with a disabling condition and/or medical condition, providing first aid and security. Appendix B provides descriptions of some of the main types of abuse

e. Create a safe environment for students to learn and staff to work

f. Provide emotional safety in classrooms, e.g., obtain parental permission for 18 certificate films to be viewed where appropriate

g. Ensure that students are taught about safeguarding via induction and tutorial so they can recognise when they or others are at risk and know how to get help

h. Ensure visiting speakers are vetted prior to attendance and always chaperoned

i. Ensure safeguarding measures including risk assessments are taken for all trips and visits

j. Take measures to prevent unsuitable people from working with young people and those with vulnerabilities

k. Allow for reporting and dealing with allegations of abuse against members of staff

l. Work closely with relevant local safeguarding partners and specifically the Local Authority Designated Officer (LADO) to ensure that the students are protected from harm

m. Take into consideration wider environmental factors through contextual safeguarding

n. Monitor the effectiveness and implementation of this policy

o. Ensure this policy, accompanying procedures and guidance are regularly reviewed for compliance.

4. Relevant Legislation

4.1 The college recognises its duties under relevant legislation and guidance as follows:

a. Education Act 2002
b. Safeguarding Vulnerable Groups Act
c. Children and Social Work Act 2017
d. Children Act 2004
e. Children and Families Act 2014
f. Counter-Terrorism and Security Act 2015
g. Human Rights Act 1998
h. Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
i. Rehabilitation of Offenders Act 1974
j. Care Act 2014
k. Equality Act 2010
l. Crime and Policing Act 2026

5. Guidance

a. Keeping Children Safe in Education 2026
b. Working Together to Safeguard Children 2026
c. Information sharing duty: statutory guidance for safeguarding partners (Children Act 2004, section 16LA),
d. SET Safeguarding Procedures 2026
e. Prevent Duty Guidance: Guidance for specified authorities in England and Wales
f. Guidance for safer working practice for those working with children and young people in education settings 2019
g. SEND Code of Practice: 0 to 25 years (2015, updated 2024)
h. DfE 'Behaviour in Schools' Guidance
i. Office for Students (OfS) Condition of Registration E6: Harassment and Sexual Misconduct
j. OfS Prevent Duty: Framework for monitoring in higher education in England

6. Linked Policies

a. Mental Health, Wellbeing and Fitness to Study Policy
b. Student Positive Behaviour Policy
c. Student Attendance Policy
d. Student Anti-Bullying and Harassment Policy
e. Equality, Diversity and Inclusion Policy
f. Health & Safety Policy
g. Lockdown Procedure
h. Data Protection Policy
i. Acceptable Use & Online Safety Policy
j. Prevention of Bullying and Harassment Policy (Staff)
k. Safer Recruitment and Selection Policy
l. Staff Disciplinary Policy

m. Staff Code of Conduct
n. Whistleblowing Policy
o. Artificial Intelligence Policy

7. Implementation and Responsibilities

7.1 The College will appoint and train a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) who will coordinate reporting procedures.

7.2 The college has a designated Governor with Safeguarding responsibilities.

7.3 Roles:

a. **Seevic Campus**
DSL – Vice Principal Quality and Learner Journey
DDSL - Safeguarding and Wellbeing Manager

b. **Palmer's Campus**
DSL – Vice Principal Quality and Learner Journey
DDSL - Student Services Manager

c. **Xtend Campus**
DSL – Vice Principal Quality and Learner Journey
DDSL - Student Services Manager
DDSL – Safeguarding and Wellbeing Manager

8. Safeguarding roles and responsibilities

8.1 All staff are expected to exercise professional curiosity, respectfully seeking to understand a student's lived experience and considering whether presenting behaviours may indicate underlying safeguarding concerns.

8.2 USP implements a whole college approach to safeguarding and promoting the welfare of students which is everyone's responsibility. This means that all staff are responsible for ensuring that they are familiar with and understand the college's Safeguarding & PREVENT Policy and procedures. All concerns should be raised promptly to the Safeguarding Team. It is important that communication is recorded in writing. Safeguarding responsibilities extend equally to apprentices, whether based on campus, in the workplace or with external employers. Staff and employers supporting apprentices must be aware of reporting routes of safeguarding concerns.

8.3 The DSL has a key responsibility for raising awareness among staff about concerns relating to the welfare of students and young people. The DSL also leads on the promotion of a safe environment for students attending the College. The DSL also takes overall responsibility for Safeguarding and Online Safety which includes, overseeing the filtering and monitoring reports, maintaining the filtering and monitoring systems and actioning on any safeguarding concerns. The DSL works closely with the Head of IT to maintain the filtering and monitoring systems, due to their specialist knowledge. The responsibilities of the DSL are detailed in Keeping Children Safe in Education 2026.

8.4 The DSL and DDSLs are responsible for applying the section 16LA information-sharing duty where applicable, making timely sharing decisions, seeking advice when detriment is considered, and ensuring staff understand that sharing supports children's welfare and early help as well as child protection.

8.5 The DSL retains oversight of all students identified as Child Protection (CP) or Children in Need (CIN). The DSL or designated DDSLs are responsible for ensuring college representation at statutory multi-agency meetings, including Child Protection Conferences, Core Groups, and Children in Need Reviews.

8.6 Where neither the DSL nor a Deputy DSL is immediately available and a child is believed to be at risk of significant harm, staff should take immediate action by making a referral to Children's Social Care and/or the Police and inform the DSL as soon as practicable thereafter.

8.7 The DDSLs act as the first point of contact for students, staff and visitors to raise concerns. The DDSLs are members of the Wellbeing and Student Services Team. They are supported by a wider team of Safeguarding representatives across the College. The DSL and DDSLs work closely with the Local Authority Designated Officer (LADO) as part of the Working Together to Safeguard Children arrangements. The College is supported by the LADO and Children and Families Services at Essex, Thurrock and Southend-on-Sea County Councils. A full description of DSL responsibilities is included at Appendix E of this policy / the Staff Safeguarding Handbook and should be read alongside this policy.

8.8 The College will ensure that the Designated Safeguarding Lead or an appropriately trained Deputy Designated Safeguarding Lead is available throughout normal College operating hours for staff to discuss safeguarding concerns.

8.9 Appropriate cover arrangements will be maintained during periods of annual leave, sickness absence, training, educational visits and other occasions when the DSL is unavailable.

8.10 Safeguarding arrangements will also be in place for activities taking place outside normal College hours, including educational visits, enrichment activities, work experience, residential trips and other College-led activities.

8.11 All staff will be informed of the DSL or DDSL who is providing safeguarding cover at any given time.

8.12 The wider Safeguarding Team have received safeguarding training and assist DDSLs and DSL with safeguarding related matters of concern.

8.13 All staff within the Student Services team hold responsibilities for the welfare of students. The team will contribute to the maintenance and development of the college's Safeguarding and PREVENT Policy. They can also offer advice to staff and students where appropriate.

8.14 Governors receive regular assurance regarding the effectiveness of filtering and monitoring arrangements, including oversight of trends, incidents, testing, system effectiveness and any identified gaps. The DSL and Head of IT work collaboratively to review effectiveness and ensure systems remain proportionate to identified risks.

8.15 Our preventative education, delivered through a planned tutorial programme and other awareness opportunities, will teach students how to keep themselves and others safe, including online. This programme will be tailored to the specific needs of all students, including those with Special Educational Needs and Disabilities (SEND), and will cover topics including healthy and respectful relationships, consent, sexual violence and harassment, and the concepts of, and laws relating to, all forms of sexual harassment and abuse, and how to access support. Fake news and conspiracy theories (KCSIE 2026).

8.16 For Higher Education students, mandatory induction training will explicitly define behaviours constituting harassment and sexual misconduct under the Equality Act 2010, detail reporting mechanisms, and offer bystanding/witness support training.

8.17 The college will work with children's services where student absence indicates safeguarding concerns.

8.18 Staff working with Higher Education students will receive appropriate training on harassment and sexual misconduct, trauma-informed responses, reporting expectations under the Office for Students (OfS) Condition E6, and the importance of balancing safeguarding responsibilities with lawful freedom of speech and academic freedom.

8.19 The College will:

a. Make available to all staff and students, the names and roles of the Safeguarding Team and the Safeguarding procedures.
b. Train all staff in recognising signs of abuse and responding appropriately, including referral procedures. This will be updated every year. All new staff receive this in induction and undertake refreshers where appropriate.
c. Train staff in safe practices to safeguard young people in the learning environment and to protect themselves from false allegations of abuse
d. Keep accurate records of all students on active Child Protection (CP) and Child in Need (CIN) plans to ensure targeted cross-departmental support.
e. Keep accurate records of concerns about individuals, even when there is no immediate referral to outside agencies.
f. Provide support and monitoring for students thought to be at risk of harm and contribute to support plans with other agencies.
g. Provide support through Student Services and tutorials to help students keep safe.

8.20 Human Resources will ensure:

a. Safer recruitment practices by adherence to the college's Safer Recruitment & Selection Policy

b. As part of its safer-recruitment arrangements, the College undertakes appropriate pre-employment checks in accordance with Keeping Children Safe in Education. These include identity, right-to-work, DBS and barred-list checks, references, employment history, professional qualifications, teaching-prohibition and overseas checks where applicable. The College will also undertake a proportionate online search of publicly available information for shortlisted candidates. Any relevant findings will be considered fairly and discussed with the candidate before an appointment decision is made

c. All staff are aware of the Whistleblowing Policy and Procedures

d. All interviews will include a person who has undertaken Safeguarding and Safer Recruitment training

e. All shortlisted candidates must be made aware that online searches will be completed as part of their recruitment process

f. In exceptional circumstances, where a Disclosure and Barring Service (DBS) certificate has not yet been obtained, an individual may only commence work where all other required pre-employment checks have been completed and satisfactory

g. A risk assessment must be undertaken and documented by the College, taking account of the nature of the role, the level of supervision in place and any other relevant safeguarding factors. Appropriate supervision arrangements must be implemented until the DBS certificate has been received and reviewed

h. Where the role constitutes regulated activity and it is legally permissible to do so, the College will obtain a separate children's barred list check before the individual commences work

i. The College will not permit an individual to undertake regulated activity where the required safeguarding checks have not been completed

j. Induction training for all staff ensures an understanding of expectations, roles and responsibilities around the college's filtering and monitoring system

k. The College maintains a Single Central Record (SCR) in accordance with Keeping Children Safe in Education requirements

l. The SCR records all pre-employment checks required for each member of staff and other relevant individuals, as applicable to their role. This includes:
   i. identity checks;
   ii. enhanced DBS checks;
   iii. children's barred list checks where the role involves regulated activity and the check is legally permitted;
   iv. prohibition from teaching checks where required;
   v. prohibition from management checks where applicable;
   vi. right-to-work checks;
   vii. overseas criminal record or other overseas checks where applicable;
   viii. verification of professional qualifications where required for the role;
   ix. checks on individuals who have lived or worked overseas;
   x. checks relating to agency and supply staff as required;
   xi. confirmation of medical fitness where applicable; and
   xii. confirmation of whether the role involves regulated activity with children, where required.

8.21 The SCR will record the date each check was completed and any other information required by statutory guidance. The College will regularly review the SCR to ensure that recruitment and vetting requirements remain compliant with current safeguarding legislation and guidance.

8.22 The Single Central Record will clearly identify which safeguarding checks apply to each category of worker, including employees, agency staff, trainee teachers, volunteers, governors, trustees, contractors and other individuals engaged in regulated activity.

8.23 Where a check is not required for a particular role, this will be recorded and evidenced in accordance with statutory guidance and the College's safer recruitment procedures.

8.24 All existing staff to be DBS re-checked on a rolling five-year programme, and a DBS redeclaration will be completed annually.

8.25 This policy is reviewed annually by the DSL in consultation with Human Resources (HR). It will also be endorsed by Governors.

8.26 Any concern or allegation that an adult working in the college may have harmed a child, may have committed a criminal offence against or related to a child, or may pose a risk of harm to children must be acted upon immediately.

8.27 Concerns must not be delayed pending discussion between the Designated Safeguarding Lead (DSL) and the Principal/CEO where immediate protective action is required to safeguard a child. Appropriate safeguarding measures should be taken without delay where there is an identified risk to a child. This may include consultation with children's social care, the police, or other relevant agencies.

8.28 The DSL is responsible for leading and coordinating safeguarding action in relation to the child or children concerned, including referrals and liaison with external safeguarding agencies. The Principal/CEO acts as Case Manager for concerns and allegations relating to staff and is responsible for overseeing the employment and disciplinary process, with support and advice

from Human Resources where appropriate.

8.29 Where the allegation concerns the Principal/CEO, the matter must be referred directly to the Chair of Governors/Trustees (or equivalent) who will assume the role of Case Manager.

8.30 The Case Manager will consult with the Local Authority Designated Officer (LADO) promptly where the allegation may meet the harm threshold, in accordance with local procedures and statutory guidance.

8.31 This procedure applies to all adults working with or on behalf of the college, including:

a. Employees
b. Agency and supply staff
c. Trainee teachers
d. Volunteers
e. Contractors and subcontractors
f. Governors, trustees and other adults working in regulated activity where applicable

8.32 Where concerns relate to individuals not directly employed by the college, the college remains responsible for managing the safeguarding process and gathering relevant facts, while working closely with the individual's employer, agency or organisation, which will normally lead any employment or disciplinary action.

8.33 In line with OfS, the college strictly regulates intimate personal relationships between staff members and students. Relevant staff members (those with direct academic or professional responsibilities over HE students), are prohibited from entering into intimate personal relationships with students, as mandated by the OfS to prevent conflicts of interest or abuses of power.

8.34 In accordance with Office for Students (OfS) regulations, the college strictly prohibits the use of Non-Disclosure Agreements (NDAs) or confidentiality clauses that prevent, restrict, or discourage HE students from disclosing information or speaking about their experiences regarding allegations of harassment or sexual misconduct.

9. Low-level concerns

9.1 A low-level concern is any concern, however small, that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but the behaviour does not appear to meet the harm threshold.

9.2 Examples may include being over-friendly with students; having favourites; taking photographs on a personal device contrary to policy; engaging with a student one-to-one in a secluded area or behind a closed door without justification; humiliating a student; using inappropriate sexualised, intimidating or discriminatory language; or communicating through unauthorised channels.

9.3 Low-level concerns must be reported promptly to the Principal/CEO or delegated Case Manager. A concern about the Principal/CEO must be reported to the Chair of Corporation via the Clerk. Staff are encouraged to self-refer where conduct could have been misinterpreted. The Case Manager will establish the facts proportionately, consult the DSL and Human Resources, and escalate immediately to the LADO route if information suggests the harm threshold may be met.

10. Recording, review and patterns

10.1 A secure record will include the concern, context, action, decisions and rationale. Records will be reviewed to identify patterns involving an individual, team, location, student group or working

practice. A pattern may require LADO consultation, supervision, training, disciplinary action or wider safeguarding action. Records and references will be managed in accordance with KCSIE, the College retention schedule and legal advice.

11. Confidential Safeguarding Reporting

11.1 Staff, students, volunteers and visitors may report safeguarding concerns directly to the safeguarding team through:

a. the Designated Safeguarding Lead;
b. Deputy Designated Safeguarding Lead;
c. the College's safeguarding reporting system;
d. the safeguarding email address wellbeingseevic@uspcollege.ac.uk and wellbeingpalmers@uspcollege.ac.uk
e. any member of staff who will immediately pass the concern to the safeguarding team.

11.2 The safeguarding mailbox is monitored throughout the College working day by members of the safeguarding team. Where a concern presents an immediate risk of harm, individuals should contact the DSL, DDSL, Children's Social Care or the Police directly rather than rely solely on email reporting.

12. Rehabilitation of Offenders statement:

12.1 All positions at the college are exempt from the provisions of Section 4(2) of the Rehabilitation of Offenders Act 1974. All applicants are required to declare all previous convictions and cautions, including those that would normally be considered “spent” unless it has been filtered in accordance with the DBS filtering rules.

12.2 The college will not unfairly discriminate against any applicant for employment based on conviction or other details disclosed. The college makes appointment decisions on the principles of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment at the college unless such record is in breach of safeguarding legislation

12.3 Failure to disclose a previous conviction may lead to an application being rejected; or, if the failure to disclose is discovered after commencement of employment, it may lead to summary dismissal on grounds of gross misconduct. Failure to disclose a previous conviction may also amount to a criminal offence.

All Staff must read the following:

a. All staff must read Part One of Keeping Children Safe in Education 2026 in full. Relevant staff must also read Part Five, and the DSL, DDSLs and relevant leaders should read Annex B.
b. Staff Code of Conduct.
c. Safeguarding and PREVENT Policy.
d. Children who are absent from education.

13. Safeguarding issues

13.1 We are committed to ensuring that all staff have an awareness of safeguarding issues that can put students at risk of harm. We recognise that behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude or semi-nude images and/or videos can be signs that children are at risk.

14. Filtering, Monitoring and Emerging Technologies

14.1 The College recognises that advances in artificial intelligence create additional safeguarding risks including deepfake imagery, AI-generated sexually explicit content, impersonation, image manipulation, AI-assisted bullying, misinformation, disinformation and online exploitation. Preventative education and staff training will include these emerging risks and students will be supported to critically evaluate AI-generated content and report concerns.

14.2 When considering online safety, the College recognises the four categories of risk (the 4Cs):

a. **Content -** Being exposed to illegal, inappropriate or harmful content, including extremist material, pornography, misinformation, self-harm content and AI-generated harmful content.

b. **Contact -** Being subjected to harmful online interaction with other users, including grooming, exploitation, coercion, cyberbullying, radicalisation and inappropriate contact facilitated through generative AI systems or AI-powered chat platforms

c. **Conduct -** Personal online behaviour that increases risk or causes harm, including bullying, harassment, sharing inappropriate content, creating, sharing or possessing AI-generated explicit images, and misuse of generative AI technologies.

d. **Commerce -** Risks relating to online gambling, scams, fraud, financial exploitation, advertising, phishing and commercial pressures.

e. The College recognises that advances in artificial intelligence have created new safeguarding risks, including the creation, possession and sharing of AI-generated explicit or sexually manipulated images. Such incidents will be treated as safeguarding concerns and managed in accordance with safeguarding, child-on-child abuse and behaviour procedures.

f. The College recognises that generative AI tools may create safeguarding risks through inappropriate interactions, manipulation, grooming, misinformation, harmful advice, impersonation, harassment and the generation of inappropriate or abusive content.

g. Students will be educated about the safe and responsible use of AI-enabled technologies and staff will remain alert to emerging risks associated with their use.

h. The College maintains appropriate filtering and monitoring systems to safeguard students when using College technology, networks and internet services.

i. The effectiveness of filtering and monitoring arrangements will be reviewed at least annually and following any significant safeguarding incident.

14.3 Responsibility for filtering and monitoring is shared as follows:

a. The responsible Senior Management Team member has strategic oversight of filtering and monitoring arrangements

b. The Designated Safeguarding Lead (DSL) oversees safeguarding implications, reviews safeguarding concerns arising from monitoring activity and ensures that systems remain appropriate to student risk

c. Information Technology (IT) staff and service providers are responsible for the operation, maintenance, configuration and security of the technical systems

d. The College will maintain documented checks of filtering and monitoring systems across all internet-connected devices and networks used by students and staff, including teaching rooms, learning resource centres, staff areas and any other relevant

locations

e. Records of reviews, testing and assurance checks will be retained.

15. Child Protection (CP) and Children in Need (CIN) Cohorts

15.1 The college recognises that students subject to Child Protection plans (Section 47) or Children in Need plans (Section 17) face significant barriers to education and are at a heightened risk of underachievement or non-completion. The college is committed to working with Children's Social Care to mitigate these risks.

15.2 The college deploys the following structured interventions:

a. Priority Attendance Monitoring: Any unauthorised absence of a CP/CIN student is flagged on the morning of the absence, triggering immediate contact with the student, parent/carer (where safe), and direct notification to their allocated Social Worker

b. Each student in this cohort is assigned a designated member of the Wellbeing Team to act as a consistent, trusted point of contact on campus

c. Flexible Academic Action Plans: Where ongoing social care interventions or emotional distress interrupt learning, curriculum teams will collaborate with the Safeguarding Team to provide reasonable adjustments, extended deadlines, or modified timetables

d. The Safeguarding Team uses data to securely track and measure the impact of support on this cohort. The DSL will report anonymised data to the Governing Body annually, evaluating:

i. Retention and Progression rates of CP/CIN students compared to the wider college benchmark

ii. Student Voice data ensuring these individuals report feeling safe and supported within the college environment.

16. PREVENT

16.1 Statement of intent: USP College recognises the positive contribution it can make towards protecting its students from radicalisation and / or violent extremism.

16.2 The College will continue to:

a. Empower its students to create communities that are resilient to extremism

b. The College recognises that contemporary risks include online radicalisation, extreme misogyny, conspiracy narratives, mixed, unstable or unclear ideologies and emerging forms of violent extremism

c. Protect the wellbeing of particular students who may be susceptible to being drawn into violent extremism or crime

d. Continue to promote the development of spaces for free debate where shared values can be reinforced.

16.3 When implementing the Prevent duty and managing external speakers, the College will have due regard to its duties to secure freedom of speech within the law and, where applicable, academic freedom. Lawful views will not be treated as safeguarding or PREVENT concerns merely because they are controversial, challenging or unpopular. The College will assess the content, context, manner of expression and evidenced risk. Freedom of speech does not extend to unlawful harassment, threats, incitement, encouragement of terrorism or other

unlawful conduct. Any restriction will be necessary, proportionate and directed to the evidenced risk rather than the viewpoint.

16.4 For Higher Education, the College will also apply the applicable Office for Students freedom-of-speech principles, including the rebuttable presumption relating to course materials and course-connected teaching, research and discussion.

a. Promote values of openness and tolerance which is characteristic of British values (British values is defined as *"democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"*)

b. Radicalisation is tackled using the Safeguarding and PREVENT Policy and procedures in the college. Radicalisation is the process by which individuals come to support terrorism or violent extremism

c. Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including schools and colleges, listed in Schedule 3 of the Act, to have 'due regard to the need to PREVENT people from being drawn into terrorism'.

d. The college's policy is formed from the National Strategy known as Counter Terrorism

e. Strategy (CONTEST). It has four elements:
   i. Pursue
   ii. Protect
   iii. Prepare

16.5 The area in which colleges have the most influence is 'PREVENT', which aims to stop people becoming terrorists or supporting terrorism.

17. Aim

17.1 The aim of PREVENT contributes to maintaining a safe, healthy and supportive learning and working environment for students, staff and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students. We further recognise that if we fail to challenge extremist views, we are failing to protect students from potential harm. As such, the PREVENT agenda, will be addressed as a safeguarding concern and dealt with in accordance with guidance from the current statutory PREVENT guidance.

17.2 PREVENT happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. It should be noted that an individual needs to consent to any support offered by the Channel Programme.

17.3 The national PREVENT Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges, and seeks to:

a. Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views

b. Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support

c. Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including education, criminal justice, faith, the internet and health.

17.4 Context

a. PREVENT sits within the realm of Safeguarding & PREVENT at the college. All staff are trained regularly and updated on the Safeguarding Policy and associated professional practices and expectations.

b. PREVENT is also integral to other areas within the college including:

i. Equality and Diversity

ii. Inclusion Health and Safety.

17.4.1 Issues related to radicalisation are included in safeguarding reports to the Governing Body.

17.5 Definitions

a. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

i. negate or destroy the fundamental rights and freedoms of others; or

ii. undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve the results in (i) or (ii)

17.6 Who Does This Policy Apply To?

a. The PREVENT agenda applies to everyone working at or attending the College. It places responsibilities on all Governors; college staff; students; agency staff and volunteers; contractors; visitors; consultants; and those working under self-employed arrangements.

17.7 Staff Responsibilities

a. Compliance with the Counter-Terrorism and Security Act 2015 will require the college to demonstrate that it undertakes appropriate training and development for Governors, managers and staff. All staff receive awareness training on an on-going basis ensuring that they are up to date with PREVENT matters.

b. As part of the staff

c. As part of the staff induction process, all staff will read Part One of Keeping Children Safe in Education 2026 in full and complete an assessment to confirm understanding. Relevant staff will also read Part Five and Annex B as set out in this policy.

d. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Staff should use their professional judgment to identify significant changes in behaviour which may be indicators of radicalisation.

e. If staff have any significant concerns about a student, staff member or visitor beginning to support terrorism and/or violent extremism, they should notify the DSL or a member of the Safeguarding Team who will make an external referral if necessary.

f. Staff should maintain professional curiosity, asking respectful questions, triangulating information and considering whether presenting behaviours may indicate underlying safeguarding concerns.

g. The College recognises the Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, and is preparing for its commencement. Protective security, evacuation, invacuation, lockdown and emergency communication arrangements are addressed through the College's security and critical incident procedures. These arrangements complement, but are distinct from, the safeguarding and PREVENT duties contained within this policy.

17.8 Governing Body

a. All Board members have a legal responsibility under the PREVENT duty to make sure they have undertaken relevant training

b. The Board must also ensure:
   i. All college Staff have undertaken training in PREVENT duty.
   ii. All college staff are aware of when it is appropriate to refer concerns about students or staff
   iii. All college staff exemplify British Values

c. Policies and procedures to implement the PREVENT duty are in place and acted upon where appropriate.

d. Governors receive annual assurance regarding:
   i. safeguarding effectiveness
   ii. PREVENT
   iii. filtering and monitoring
   iv. sexual harassment
   v. OfS E6
   vi. staff training compliance
   vii. safeguarding data
   viii. audit outcomes

17.9 Students

a. Students receive awareness training as part of their induction processes. This is further enforced through tutorial activities including exploration of the British Values topics. Curriculum teams will identify opportunities within their programme of study to highlight British Values.

17.10 Partnerships

a. The college maintains well-established partnerships, including a partnership with the Counter-Terrorism Unit, to receive regular updates to keep staff and students safe and well informed

b. The college maintains partnerships with the Police through the Essex, Thurrock and Southend PREVENT leads to ensure high quality training and support and works closely with the PREVENT regional coordinator.

17.11 The College is represented within the relevant local safeguarding partnership arrangements and liaises with the relevant Multi-Agency Safeguarding Hubs (MASH) to ensure intelligence is shared and acted upon as necessary.

18. Work Experience and Industry Placements

18.1 Employers offering work experience placements are required to complete and provide all necessary paperwork required by USP College including risk assessment and health and safety documents. These requirements also apply to apprenticeship providers. All apprenticeship providers and workplace mentors must comply with the college's safeguarding and PREVENT expectations, ensuring apprentices are safeguarded both in the workplace and during off-the-job training. Full details about the arrangements are available from the Work Experience and Careers Team.

18.2 Safeguarding records should be maintained and stored in accordance with GDPR/DP and best safeguarding practice.

18.3 Use of a database called Grofar streamlines and links communication to employers and students to the safeguarding and PREVENT link on the MyUSP app.

18.4 Employers receive safeguarding expectations annually and are expected to report safeguarding concerns immediately using the College safeguarding procedures.

18.5 Visitors to campus, contractors and consultants:

a. On arrival visitors are required to sign-in at reception, provided with visitor ID badge and are collected by the person they are visiting

b. For visiting speakers (VS) and guest lecturers (GL), the college undertakes a risk assessment prior to the VS/GL being authorised to deliver a talk at USP College

c. Contractors and non-employees undertaking work at USP College must comply with the college's Health and Safety and safeguarding requirements

d. Organisations wishing to hire the college facilities are informed of their safeguarding responsibilities by the Executive Director Estates Operations.

19. Providing a safe environment

19.1 All students, staff and visitors are required to wear an ID badge and lanyard.

19.2 The college also utilises Smoothwall software to monitor student activity online and manage potential risks.

19.3 Through our tutorial programme, lesson activities and online platforms, we ensure students have access to essential online safety information. This comprehensive approach covers the fundamental risks of content, contact, conduct, and commerce, and includes a focus on the dangers posed by misinformation, disinformation, fake news, and conspiracy theories.

19.4 The College is protected by CCTV.

19.5 Security staff and duty managers are vigilant and conduct regular campus safety walks and a

duty manager rota.

19.6 Supporting students' well-being:

a. The wellbeing teams and counsellors support students. Students can drop in for support or can contact the team through the following ways:

i. Seevic Campus – wellbeingseevic@uspcollege.ac.uk

ii. Palmer's Campus – wellbeingpalmers@uspcollege.ac.uk

iii. Xtend campus can contact either of the above email addresses

iv. Safeguarding Emergency Designated Line - 01268 882 665 and 07825 877263

v. The MyUSP App Safeguarding & Wellbeing Dashboard.

b. In addition, counsellors can offer online meetings with students in accordance with the British Association for Counselling and Psychotherapy (BACP) Guidelines

c. The Safeguarding Team are available between 8.30am and 4.30pm during term time.

d. Links to some alternative resources should students require support out of hours include:

i. Kooth-chat online with friendly counsellors, read articles written by young people and receive anonymous online support.
ii. Samaritans – often through the phone they can provide emotional support.
iii. Mind – a mental health charity who can provide information and advice.
iv. SANEline – out of hours mental health helpline.
v. Student Minds – student mental health charity.
vi. Every Mind Matters – they offer simple and practical advice to help you stay mentally healthy.
vii. NHS – they have dedicated resources available to help deal with stress, anxiety or depression.
viii. Additional contacts and support materials can be found on the MyUSP app Safeguarding & Wellbeing Dashboard.

19.7 Safeguarding Record-Keeping

a. Access to safeguarding records held on CPOMS is controlled through role-based permissions and is restricted to staff with a legitimate safeguarding need to know. Access levels are determined by the DSL and reviewed regularly to ensure confidentiality and compliance with data protection requirements

b. Safeguarding records received from a previous school are stored in a lockable cabinet and recorded under confidential comments on CPOMS.

19.8 Information Sharing and Child Protection Records

a. All safeguarding records will be accurate, factual, contemporaneous and sufficiently detailed to enable effective safeguarding decision-making

b. Records will clearly distinguish between:

i. current safeguarding concerns;
ii. historical safeguarding information;
iii. actions taken;

iv. outcomes reached; and

v. the rationale for safeguarding decisions.

c. Where safeguarding concerns are transferred internally or externally, a structured safeguarding summary will accompany the information to ensure continuity of support and risk management.

d. When a student subject to child protection or safeguarding concerns transfers to another education provider, the College will securely transfer the child protection file separately from the main student record

e. For in-year transfers, safeguarding files will be transferred within five working days

f. For transfers at the start of a new academic year, safeguarding files will be transferred within the first five working days of the new term

g. The College will obtain and retain confirmation that safeguarding records have been received by the receiving provider

h. All information sharing will be undertaken in accordance with data protection legislation and safeguarding duties, recognising that safeguarding concerns may justify information sharing where it is necessary to protect a child.

i. The College recognises its responsibilities under section 16LA of the Children Act 2004 to share relevant information with safeguarding partners when the statutory duty applies. Information sharing can support safeguarding and promoting a child's welfare before child protection thresholds are met, including emerging concerns, unmet needs, prevention and early help.

j. When considering sharing, staff and the DSL team will assess whether information is relevant to a child's safety or welfare and may help another agency assess risk, identify need, make decisions, provide support or take safeguarding action. Information may concern the child, parents/carers, family members, peers or other connected adults. Relevant information will not be withheld solely because a learner may pose a risk to another child rather than being at risk themselves.

k. Consent is not required where information is shared under an applicable statutory safeguarding duty or other lawful basis. Lack of learner or parental consent must not prevent lawful and appropriate safeguarding sharing. The College will be transparent with learners and families where safe and appropriate; informing them is not the same as seeking permission.

l. Information must not be withheld solely because a Section 47 or other statutory intervention threshold has not been met. Where the section 16LA duty applies, the limited statutory exception concerning whether sharing would be more detrimental to the child than not sharing must be considered carefully and is expected to be rare. The DSL team will seek appropriate advice before relying on detriment as a reason not to share.

m. Staff must promptly refer relevant concerns to the DSL team, which will make timely information-sharing decisions and work with local safeguarding partners, children's social care, police, health services and other relevant agencies in accordance with applicable local safeguarding partnership arrangements and information-sharing protocols. Immediate safeguarding referrals must not be delayed while awaiting DSL advice.

n. Decisions to share or not to share, including relevance, proportionality, the lawful basis, any potential detriment and the rationale, must be recorded securely. Data protection legislation does not prevent lawful safeguarding information sharing. The College will share information lawfully, fairly, proportionately and securely in accordance with UK GDPR, the Data Protection Act 2018 and statutory safeguarding guidance.

19.9 Confidentiality

a. Confidential comments regarding safeguarding, wellbeing or counselling are recorded on CPOMS by category and reason allowing for accurate reporting. These records are only accessible to college counsellors and the core Safeguarding Team.

b. Transfer of electronic files and information to external partners is encrypted. Confidential information received from external partners is password protected.

Appendix A

Safeguarding Referral Procedure

(This applies to all college students regardless of age)

Staff have been informed that they must refer students who disclose any information relating to safeguarding to the DSL or the DDSL at each campus.

Student discloses to member of staff information which causes staff member to have concerns about student's welfare (verbally *or by e-mail*) or if an allegation is made against a member of staff, the HR team will be informed immediately. The Safeguarding Team will support HR if and when appropriate.

Dedicated Safeguarding Referral Line

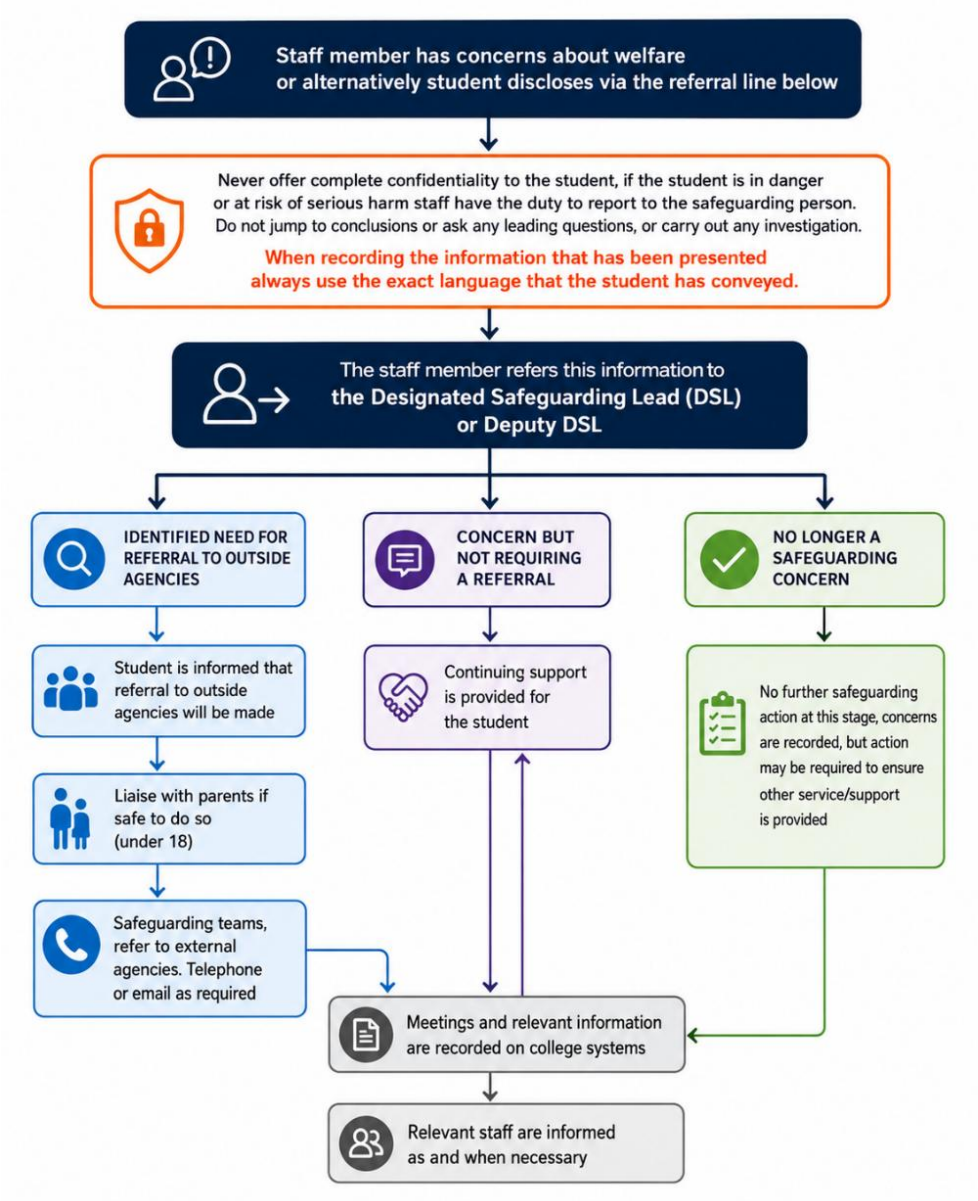
Direct Dial 01268 882665

In the absence of both the Designated Safeguarding Lead and Deputy Safeguarding Lead, the following out of hours number should be called:

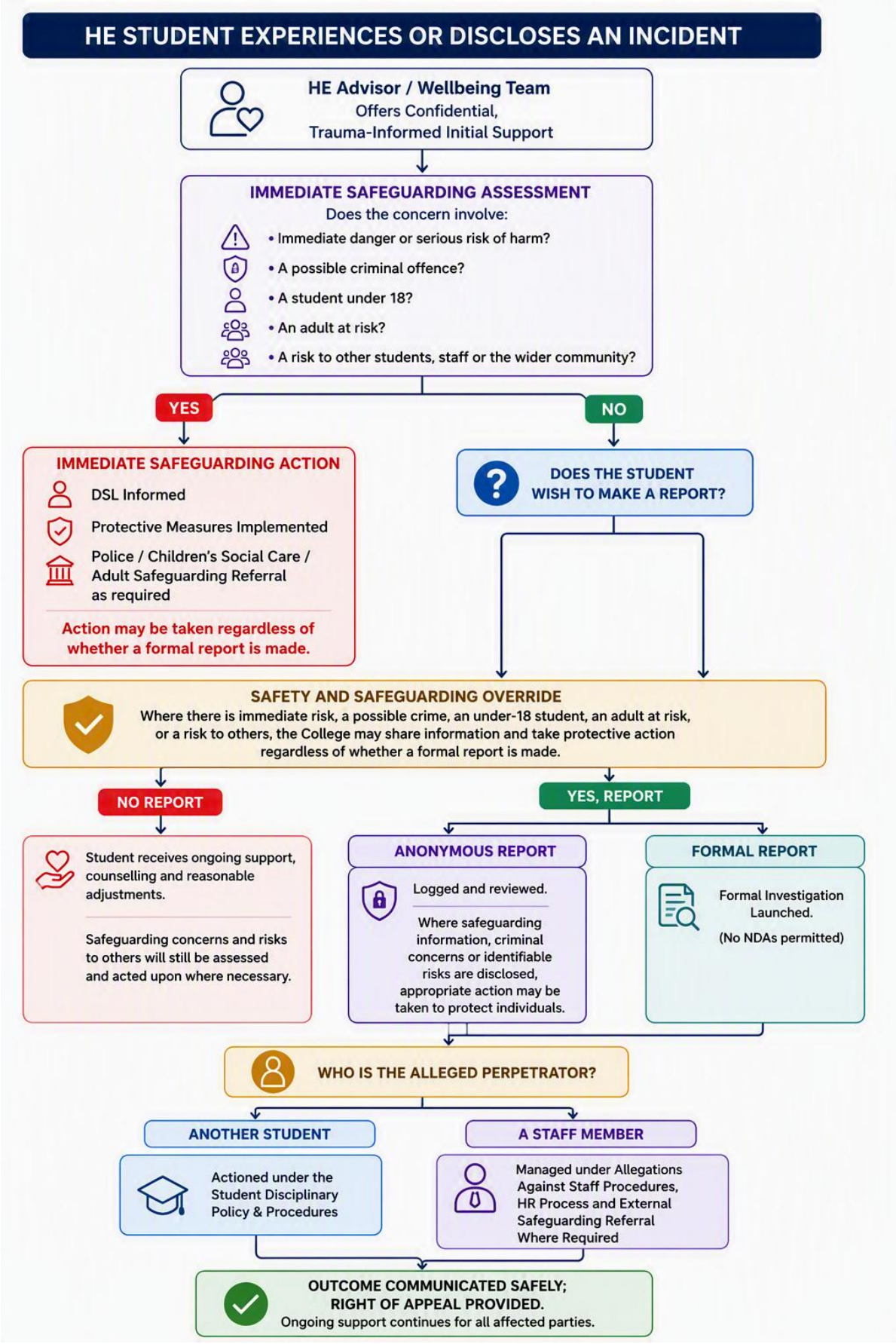
Social Care Essex: 0345 6061212/0345 6037627

Thurrock: 01375 652802/01375 372468

Southend: 01702 215007/0345 606121



Appendix B


HE STUDENT EXPERIENCES OR DISCLOSES AN INCIDENT
HE Advisor / Wellbeing Team
Offers Confidential,
Trauma-Informed Initial Support
IMMEDIATE SAFEGUARDING ASSESSMENT
Does the concern involve:
• Immediate danger or serious risk of harm?
• A possible criminal offence?
• A student under 18?
• An adult at risk?
• A risk to other students, staff or the wider community?
YES
NO
IMMEDIATE SAFEGUARDING ACTION
DSL Informed
Protective Measures Implemented
Police / Children's Social Care / Adult Safeguarding Referral as required
Action may be taken regardless of whether a formal report is made.
DOES THE STUDENT WISH TO MAKE A REPORT?
SAFETY AND SAFEGUARDING OVERRIDE
Where there is immediate risk, a possible crime, an under-18 student, an adult at risk, or a risk to others, the College may share information and take protective action regardless of whether a formal report is made.
NO REPORT
YES, REPORT
Student receives ongoing support, counselling and reasonable adjustments.
Safeguarding concerns and risks to others will still be assessed and acted upon where necessary.
ANONYMOUS REPORT
Logged and reviewed.
Where safeguarding information, criminal concerns or identifiable risks are disclosed, appropriate action may be taken to protect individuals.
FORMAL REPORT
Formal Investigation Launched.
(No NDAs permitted)
WHO IS THE ALLEGED PERPETRATOR?
ANOTHER STUDENT
A STAFF MEMBER
Actioned under the Student Disciplinary Policy & Procedures
Managed under Allegations Against Staff Procedures, HR Process and External Safeguarding Referral Where Required
OUTCOME COMMUNICATED SAFELY;
RIGHT OF APPEAL PROVIDED.
Ongoing support continues for all affected parties.

Appendix C

Safeguarding Contact List

The following are the current Safeguarding Team members:

Seevic Campus	Job Role	Contact Number
Hannah Johnson	Vice Principal Quality and Learner Journey and Designated Safeguarding Lead	01268 756 111 Ext 271
Michelle Lagden	Deputy Designated Safeguarding Lead & Safeguarding, Wellbeing and Mental Health Manager	01268 756 111 Ext.157
Andy Shepherd	Head of Student Services	01268 756 111 Ext.272
Helen Ansell	Wellbeing Advisor	01268 756111 Ext 158
Rachael Chapman	Wellbeing Advisor	01268 756111 Ext 408
Jason Abbott	Campus Safety and Behaviour Manager	01268 756111 Ext. 274
Louise Read	Positive Behaviour Officer	01268 756111 Ext. 274
Paul Nutter	Lead Governor for Safeguarding	Via Clerk to the Corporation
Out-of-hours safeguarding contact	NA	07825 877263

Palmer's Campus	Job Role	Contact Number
Hannah Johnson	Vice Principal Quality and Learner Journey and Designated Safeguarding Lead	01268 756 111 Ext 271
Nickie Hillebrandt	Deputy Safeguarding Lead & Student Services Manager	01375 370121 Ext.549
Andy Shepherd	Head of Student Services	01375 370121 Ext.272
Mandy Monksfield	Wellbeing Advisor	01375 370121 Ext. 616
Jason Abbott	Campus Safety and Behaviour Manager	01268 756111 Ext. 274
Jermaine Simpson	Positive Behaviour Officer	01375 370121 Ext. 588
Paul Nutter	Lead Governor for Safeguarding	Via Clerk to the Corporation
Out-of-hours safeguarding contact	NA	07825 877263

XTEND Digital Campus	Job Role	Contact Number
Hannah Johnson	Vice Principal Quality and Learner Journey and Designated Safeguarding Lead	01268 756 111 Ext 271
Nickie Hillebrandt	Deputy Safeguarding Lead & Student Services Manager	01375 370121 Ext.549
Michelle Lagden	Deputy Safeguarding Lead & Safeguarding, Wellbeing and Mental Health Manager	01268 756 111 Ext.157
Andy Shepherd	Head of Student Services	01268 756 111 Ext.272
Paul Nutter	Lead Governor for Safeguarding	Via Clerk to the Corporation
Julie Clark	Supported Employment Manager	01268 756111 Ext 285
Samantha Eldridge	Higher Education Student Adviser and Administrator	01268 822688 Ext 284
Jason Abbott	Campus Safety and Behaviour Manager	01268 756111 Ext. 274

Out-of-hours safeguarding contact	NA	07825 877263

External Agencies

Children and Families Hub	0345 603 7627
Essex Safeguarding Children Board (ESCB)	https://www.escb.co.uk/ Out of Hours: 0345 606 1212
Thurrock - Multi-Agency Safeguarding Hub (MASH)	01375 652802 thurrockmash@thurrock.gov.uk
Thurrock Local Safeguarding Children Partnership	https://www.thurrocklscp.org.uk/ Out of Hours: 01375 372468
Adult Safeguarding Essex	0345 603 7630
Adult Safeguarding Thurrock	01375 511000
Adult Safeguarding Southend	01702 215008
Emergency Police	999
Non-Emergency Police	101

Appendix D

What college staff should look out for

Safeguarding and promoting the welfare of children is defined in KCSIE as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

We must always bear this in mind when supporting our students

The following information provides detail on some of the key topics to be aware of in relation to Safeguarding young people.

Providing Help and Support for Children

The College recognises that safeguarding support exists on a continuum and that children may require different levels of help and protection depending on their needs and circumstances.
2
Staff should not wait for concerns to escalate before seeking advice from the DSL. Early identification, assessment and intervention are central to effective safeguarding. Concerns may require support through universal services, targeted Family Help, Child in Need services under Section 17 of the Children Act 1989, or Child Protection intervention under Section 47 of the Children Act 1989.

Any child may benefit from family help, early help and statutory safeguarding support but all school and college staff should be particularly alert to the potential need for help and support services for a child who identifies as:

- SEND
- care experienced
- young carer
- LGBTQIA+
- experiencing homelessness
- asylum seekers/refugees
- affected by domestic abuse
- is disabled and has specific additional needs;
- signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- frequently missing/goes missing from care or from home;
- at risk of modern slavery, trafficking or exploitation;
- at risk of being radicalised or exploited;
- a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- misusing drugs or alcohol themselves;
- has returned home to their family from care;
- a privately fostered child;

- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- has a parent or carer in custody, or is affected by parental offending;
- Exhibits unexplainable and/or persistent absences from education;

The College recognises that students with special educational needs and disabilities can face additional safeguarding challenges. The Safeguarding Team work closely with the SEND team in this regard.

Levels of Support

The College follows local safeguarding partnership arrangements and recognises four broad levels of support for children and families:

Universal Services
Most children's needs will be met through universal services such as education, healthcare and community provision. Staff should remain alert to emerging concerns and provide support through normal pastoral and educational processes.

Family Help (Targeted Early Help)
Some children and families may benefit from targeted Family Help services when needs cannot be met through universal services alone. Family Help aims to prevent concerns from escalating and may involve coordinated support from multiple agencies.

Section 17 Child in Need
A referral to Children's Social Care may be appropriate where a child is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services, where their health or development is likely to be significantly impaired without services, or where they are disabled.

Section 47 Child Protection
Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the College will make an immediate referral to Children's Social Care and/or the Police in accordance with local safeguarding procedures.

Local Thresholds and Referral Routes

The College follows the safeguarding threshold guidance issued by the local safeguarding partnership. Where concerns arise, staff must report them immediately to the DSL or Deputy DSL. The DSL will consider the child's level of need and determine the most appropriate response, which may include:
• support through College pastoral systems;
• referral to Family Help services;
• referral to Children's Social Care;
• referral to the Police;
• referral to health or specialist support services; or
• multi-agency safeguarding intervention.

Staff may make a direct referral to Children's Social Care if they believe a child is at immediate risk of harm and are unable to contact a member of the safeguarding team. The DSL must be informed as soon as possible afterwards.

Abuse, Neglect and Exploitation

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse neglect and exploitation so that they are able to identify cases of children

who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

For students aged 18 and over (including Higher Education students), 'Harassment' carries the meaning given in Section 26 of the Equality Act 2010 and the Protection from Harassment Act 1997. 'Sexual Misconduct' includes any unwanted or attempted unwanted conduct of a sexual nature, including sexual harassment, sexual assault, and rape.

Indicators of abuse, neglect and exploitation

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

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

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

Child Sexual Exploitation (CSE)

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

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

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

Child Criminal Exploitation (CCE)

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Further information about CCE including definitions and indicators is included in Annex B.

Child on Child abuse

Child-on-child abuse is managed through this Safeguarding and Child Protection Policy. The Student Anti-Bullying and Harassment Policy should be read alongside this procedure but does not replace safeguarding processes. All reports of child-on-child abuse will be treated as safeguarding concerns and responded to in accordance with this procedure.

All reports of child-on-child abuse, including sexual harassment and sexual violence, will be considered carefully on a case-by-case basis and managed through a formal safeguarding process led by the DSL. The College recognises that a child who is alleged to have harmed another child may also require safeguarding support.

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

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

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

- bullying (including online bullying, cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nudes or semi-nude image, including AI-generated material, weapon-related harm, misogyny/misandry, modern slavery and the expanded domestic-abuse, CCE/CSE, mental-health and serious-violence content. Every nude/semi-nude incident involving an under-18 must receive a safeguarding response.
- upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school's or college's policy and procedures with regards to Child on Child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will receive training on Child on Child abuse as part of their initial safeguarding training during their induction period. This ensures that they have a clear understanding of how to identify cases of Child on Child abuse and any concerns will be reported to the DSL or deputy DSL and safeguarding referral procedures will be followed. The college needs to be mindful that in these cases support will need to be provided for all children involved. A number of factors will need to be taken into consideration, including the management of contact between victim and perpetrator, this may include remote learning until the situation is made safe.

All staff are aware of the increased potential for bullying or child on child abuse towards SEND students. Staff make reasonable adjustments for disabled children and young people to deal with particular disadvantages and signpost students to specialist SEND services.

The college has a zero tolerance approach to abuse and it will never be passed off as banter, having a laugh, part of growing up or boys being boys, as this can lead to a culture of unacceptable behaviours and an unsafe environment for our students.

Child-on-Child Abuse: Prevention and Response Procedure

Preventing Child-on-Child Abuse

The College recognises that child-on-child abuse can occur both inside and outside of the College, face-to-face and online. The College maintains a zero-tolerance approach to abuse and works proactively to prevent it through:

Safeguarding education and tutorial programmes

Promotion of respectful relationships

Student awareness campaigns

Staff training

Effective supervision and risk assessment

Clear behaviour expectations

Accessible reporting routes for students

A culture that encourages students to report concerns

The College will never dismiss abusive behaviours as:

"banter"

"just having a laugh"

"part of growing up"

"boys being boys"

or any other explanation that minimises abuse.

Reporting Concerns

Students may report concerns through:

Any member of staff

The Designated Safeguarding Lead (DSL)

Deputy DSLs

Tutors, Progress Coaches or Student Services

Online reporting systems (where available)

Anonymous reporting mechanisms (where available)

All staff must:

take reports seriously;

reassure the child they have been listened to;

avoid promising confidentiality;

make an accurate written record;

report the concern to the DSL immediately.

No report will be dismissed as insignificant or assumed to be part of normal adolescent behaviour.

Initial Safeguarding Response

Following a report of child-on-child abuse, the DSL (or Deputy DSL) will undertake an immediate risk and needs assessment.

This assessment will consider:

the welfare and safety of the victim;

the nature and seriousness of the alleged incident;

the age, developmental stage and needs of the children involved;

any power imbalance;

whether there is a pattern of behaviour;

whether the incident may constitute a criminal offence;

the ongoing safety of all students.

The safety and welfare of the victim will be the College's first priority.

Recording and Investigation

All allegations, disclosures, incidents and outcomes will be:

recorded on the College safeguarding recording system;

stored securely;

monitored for patterns or repeat concerns;

managed in accordance with data protection requirements.

The College will gather information proportionately and sensitively whilst avoiding actions that could compromise external investigations.

Referrals to External Agencies

The DSL will consider whether referral is required to:

Children's Social Care;

the Police;

Family Help, Early Help and statutory safeguarding support services;

Health services;

other safeguarding partners.

Where sexual violence, sexual assault, exploitation or other criminal offences may have occurred, the Police will be consulted as appropriate.

Support for the Victim

The College will ensure that appropriate support is provided to the victim. Support may include:

safeguarding intervention;

counselling or wellbeing support;

pastoral support;

timetable adjustments;

risk management arrangements;

assistance to continue accessing education safely.

The wishes of the victim will be considered wherever possible, alongside the College's safeguarding responsibilities.

Support for the Alleged Perpetrator

Where appropriate, support will also be provided to the alleged perpetrator, recognising that they may themselves be vulnerable or require safeguarding intervention.

This may include:

pastoral support;

behavioural support;

risk management arrangements;

referral to external agencies;

educational support during any investigation.

Support for Other Children

The College will consider whether:

witnesses;

friendship groups;

classmates; or

other affected students require support, intervention or monitoring following an incident.

Managing Contact Between Students

Following a risk assessment, measures may be implemented to protect students, including:

supervision arrangements;

timetable changes;

movement restrictions;

alternative teaching arrangements;

remote learning;

restricted contact between parties.

These arrangements will be regularly reviewed.

Confidentiality and Information Sharing

The College will manage information sensitively and share information on a need-to-know basis only.

Staff must not promise confidentiality to any child making a disclosure. Information will be shared where necessary to safeguard children, support investigations and comply with statutory safeguarding duties.

Review and Monitoring

The DSL will monitor all child-on-child abuse cases to ensure:

risks remain appropriately managed;

support plans remain effective;

referrals are progressed;

outcomes are reviewed;

lessons learned inform future safeguarding practice.

Serious violence

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

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and adults at risk: county lines guidance.

Departmental advice What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

Female Genital Mutilation

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

Extra-Familial Harm

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at https://www.gov.uk/guidance/forced-marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

So-called 'honour'-based abuse (HBA):

So-called 'HBA' encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Mental Health

Mental health concerns will always be considered alongside possible safeguarding concerns and staff will avoid assuming that mental health alone explains changes in behaviour.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood

experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

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

Missing in Education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

The College recognises that persistent absence, repeated lateness, patterns of non-attendance and unexplained withdrawal from education may be indicators of abuse, neglect, exploitation or mental health concerns and will be considered as potential safeguarding indicators.

The College has an Attendance Policy which underpins arrangements to ensure that students with poor attendance are monitored and appropriate support plans are in place.

Appendix E

Designated Safeguarding Lead Responsibilities

The DSL's responsibilities include:
• managing child protection and safeguarding concerns;
• supporting staff in safeguarding decision-making;
• referring concerns to Children's Social Care, Police and other agencies as appropriate;
• acting as a source of safeguarding expertise;
• maintaining safeguarding records;
• promoting the welfare of children;
• overseeing online safety, filtering and monitoring safeguarding implications;
• ensuring safeguarding training is effective;
• working with parents, carers and external agencies;
• supporting transition and information sharing arrangements; and
• promoting a whole-college approach to safeguarding.

Equality and Diversity Statement & Impact Assessment

USP College is committed to equality of opportunity. The aim is to create an environment in which people treat each other with mutual respect, regardless of: age, disability, family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, gender identity, transgender, sexual orientation, trade union activity or unrelated criminal convictions.

USP College is committed to maintaining a safe, sustainable environment for all students, staff and visitors at all times.

This form should be used by managers and policy owners within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including, but not limited to: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation. The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

1. Name of Policy

Safeguarding and PREVENT Policy

2. Which of the following groups could be affected by this policy?
(Tick all that apply)

Students	√
Staff	√
Wider Community	√

3. Complaints

Have complaints been received from anyone with one or more protected characteristic about the service provided? If yes then please give details.

4. The Impact

Four possible impacts should be considered as part of the assessment:

a. **Positive Impact -** Where the policy might have a positive impact on a particular protected characteristic.
b. **None or Little Impact –** Where you think a policy does not disadvantage any of the protected characteristics
c. **Some Impact –** Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one particular group of individuals with protected characteristic is likely to be greater than on another.
d. **Substantial Impact –** Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one particular protected characteristic is likely to be greater than on another.

Thought-provoking questions, which might help come to a decision about the impact of a policy on individuals with protected characteristics:

e. Does policy outcomes and service take up differ between people with different protected characteristics?
f. What key information do we have? Does data or engagement with people with protected characteristics give insights into areas of disadvantage, which relate to the policy area?
g. If the policy is likely to have a negative impact on individuals, sharing particular characteristics what steps can be taken to mitigate these effects?
h. Will the policy deliver practical benefits for certain groups?
i. Does the policy miss opportunities to advance equality of opportunity and foster good understanding/ relationships between groups?

j. Do other policies need to change to make this policy more effective?
k. Is there any elements of the policy that could be unlawful under the Equality Act 2010?

Use the guidance provided above and complete the following table: **(Please Tick √)**

Gender/Age	**Positive Impact**	**No or Little Impact**	**Some Adverse Impact**	**Substantial Adverse Impact**
Gender		√		
Age		√		
Disability	**Positive Impact**	**No or Little Impact**	**Some Adverse Impact**	**Substantial Adverse Impact**
Visually Impaired		√		
Hearing impaired		√		
Physical Disability		√		
Specific Learning Difficulties		√		
Global Learning Difficulties		√		
Autistic Spectrum Disorder		√		
Any other disability – Various		√		
Other Factors	**Positive Impact**	**No or Little Impact**	**Some Adverse Impact**	**Substantial Adverse Impact**
Race		√		
Culture		√		
Religious Belief		√		
Sexual Orientation		√		
Gender Reassignment		√		
Marriage/Civil Partnership		√		
Pregnancy /Maternity /Paternity		√		

Additional Considerations	Positive Impact	No or Little Impact	Some Adverse Impact (mitigation if applicable)	Substantial Adverse Impact (mitigation if applicable)
Trauma Informed*	√			
Safeguarding (incl. PREVENT) – have any risks to safety been identified / mitigated / eliminated?	√			
Health & Safety – have any risks been identified / mitigated / eliminated?	√			
Sustainability – are there any anticipated impacts?		√		

**Trauma results from an event, series of events, or set of circumstances that is experienced by an individual as harmful or life threatening. While unique to the individual, the experience of trauma can cause lasting adverse effects, limiting the ability to function and achieve mental, physical,*

social, emotional or spiritual well-being. Consideration of support and/or reasonable adjustment(s) needs to be given where the college is aware of such circumstance being applicable to any member of staff who may be affected by this policy. This is to avoid re-traumatisation which is the re-experiencing of thoughts, feelings or sensations experienced at the time of a traumatic event or circumstance in a person's past. Re-traumatisation is generally triggered by reminders of previous trauma which may or may not be potentially traumatic in themselves.

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the below action plan.

5. Is there anything that cannot be changed?

What cannot be changed?	Can this be justified?	If so, how?
Not applicable		
E.g., Disabled people can be treated more favorably under the Disability Discrimination Act 2005. If a policy appears to treat disabled people more favorably than other equality groups, the disadvantage may be justifiable		

Please list the main actions that you plan to take as a result of this assessment in your area of responsibility. (Continue on separate sheets as necessary)

Action Plan: