



Safeguarding & Prevent Duty Policy

Person responsible for ensuring that this policy is implemented and reviewed in line with the dates below:	Pam Wallace – Principal and DSL London Nicola Lombardo Deputy DSL – Sussex
Policy approved by	Quality Curriculum & Performance Committee/Board
Date of Last Review	September 25
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Changes since last policy update

Policy updated in line with Keeping Children Safe in Education (KCSiE) 2025 (see appendix 3):

Summary of key changes:

1. The 2025 guidance adds **disinformation, misinformation** and **conspiracy theories** to the list of content risks under online safety. **Disinformation** is the deliberate creation and spread of false or misleading content, such as fake news. **Misinformation** is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023) – **see page 16**
2. Filtering and monitoring KCSiE 2025 includes a link to the DfE guidance Generative AI: product safety expectations. This guidance on generative artificial intelligence (AI) explains how filtering and monitoring requirements apply to the use of generative AI in education and supports schools to use generative AI safely. – **see page 16**

Introduction

This document is the Safeguarding and Prevent Duty Policy & Procedures for London Learning Consortium (LLC) and its sister company DV8, which will be followed by all members of the organisation and followed and promoted by those in the position of leadership within the organisation.

LLC recognises that it has an explicit duty to safeguard and protect children, young people, and adults at risk from abuse as defined in statutory guidance outlined in the Children's Act 2004, Care Act 2014, Section 175 of the Education Act 2002, Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2025 [DFE) and the Prevent Duty as outlined in the Counter-Terrorism and Security Act 2015. This is combined with non-statutory guidance 'What to do if you are worried a child is being abused' (HM Government, March 2015) and 'Information Sharing: advice for practitioners providing safeguarding services' (DfE July 2018).

The Prevent Duty is part of a government initiative to develop a robust counter terrorism programme, CONTEST. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalization which needs to be addressed, including education, criminal justice, faith, charities, the internet, and health

LLC & DV8 will ensure all reasonable steps are taken to ensure suspicions and allegations are taken seriously, responded to quickly and appropriately and Extremist Organizations are not inadvertently funded.

We strive to ensure that all learners and staff at LLC & DV8 are treated in line with our Equality and Diversity Policy and feel safe and supported at all times.

There are four main themes to our safeguarding policy:

- Prevention through the creation of a positive atmosphere and the teaching and pastoral support offered to learners.
- Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.
- Support is provided to learners and staff who may be affected by safeguarding concerns or issues arising from them.
- Safe recruitment practices to ensure that any staff member or volunteer is recruited according to our overall Safeguarding Policy.

All staff and students at LLC & DV8 understand that

"Safeguarding is everyone's responsibility"

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1. SAFEGUARDING AND PREVENT DUTY POLICY

This policy is in place to protect all students who attend LLC & DV8 Sussex. We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to prevent abuse. LLC & DV8 Sussex will therefore:

- Establish and maintain an environment where students feel safe and secure and are encouraged to talk and are listened to.
- Ensure that students know that there are adults within LLC & DV8 Sussex who they can approach if they are worried or are in difficulty.
- Where possible include in the curriculum activities and opportunities for personal and social development (PSD), which equip students with the skills they need to stay safe.
- Where possible include in the curriculum activities that will help students develop realistic attitudes to the responsibilities of adult life.
- Ensure that wherever appropriate every effort will be made to establish effective working relationships with parents and/or colleagues from partner agencies.

1.1 ***Roles & Responsibilities The Legal Framework***

This policy and the accompanying procedures have been developed in accordance with local and national statutory and non-statutory guidance including:

- *Working Together to Safeguard children 2023*
- *Children's Act 1989*
- *Care Act 2014*
- *United Convention of the Rights of the 1991*
- *Data Protection Act 1998*
- *Human Rights Act 1998*
- *Sexual offences Act 2003*
- *Children Act 2004*
- *Safeguarding Vulnerable Groups Act 2006*
- *Protection of Freedoms Act 2012*
- *Children and Families Act 2014*
- *Special Educational Needs and Disability (SEND) code of practice 0-25 yrs. – HM Government 2014*
- *Information Sharing Advice for practitioners providing safeguarding services to children, young people and parents and carers HM Government 2015*
- *Keeping children safe in Education (KCSIE): Statutory guidance for schools and colleges Revised Sept 2025*
- *Working Together to Safeguard children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of children, July 2018*
- *Pan-Sussex/London Protection and Safeguarding Procedures*
- Counter-Terrorism and Security Act 2015 (the Act) – Prevent Duty (section 29)
- *Homelessness Act 2017*

Definitions

1. Safeguarding - 'No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this document in line with KCSiE 2025 and the Working together to safeguard Children guidance 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.
2. Child at risk - A ‘child’ is defined as a person aged up to 18. ‘Keeping Children Safe in Education’ 2024 recognises the additional vulnerabilities of ‘looked after children’ and care leavers. The Children Act 2004 also covers vulnerable adults with a disability up to the age of 25.
3. A vulnerable adult is defined as “a person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation” (Safeguarding Vulnerable Groups Act 2006). Adult at Risk - An adult aged 18 years or over who may need community care services by reason of mental or other disability, age, or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

An ‘Adult at Risk’ (list below is not exhaustive) may therefore be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment

Has a:

- learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to ADULTS
- and is subject to abuse • is unable to demonstrate the capacity to decide and needs care and support

Keeping Children Safe in Education 2025 states that all staff working directly with children MUST read at least part 1 of the KSCIE guidance. Staff who do not work directly with children should read Part 1 or Annex A of the guidance.

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the college are exercised with a view to safeguarding and promoting the welfare of children who are students at the college. Section 157 of the same Act places a similar duty on non-maintained and independent colleges, including free schools and academies.

Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent colleges, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools and colleges are required to have “due regard to the need to prevent people from being drawn into terrorism”.

Under section 14B of the Children Act 2004, as amended by the Children & Social Work Act 2017, the Local Safeguarding children Board or the Local Safeguarding Partners can require a

school or further education institution to supply information in order to perform its functions. This must be complied with.

ROLES AND RESPONSIBILITIES

All LLC & DV8 Sussex staff, Board of Directors, and volunteers have a duty to safeguard children and young people who come into contact with the organisation, and to respond to any concerns they may have regarding physical, sexual, or emotional, abuse or neglect as well as awareness and response to issues of self-harm, radicalisation (PREVENT), criminal or sexual exploitation, forced marriage, honour-based abuse or female genital mutilation.

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within LLC & DV8 Sussex and the local authority who have specific responsibilities under safeguarding procedures. The names of those carrying out these responsibilities are listed on the cover sheet of this document.

1.2 LLC & DV8 Sussex Designated Safeguarding Lead

This person has overall responsibility for the implementation and development of the Safeguarding Policy and Procedures across the organisation and to ensure that all correct procedures are being followed at all times across all centres.

- The DSL will be the key liaison officer between LLC & DV8, contract partners, children's social care, the Police, the local Prevent police/local authority officer and any other external parties relevant to any particular case.
- The DSL will ensure all safer recruitment procedures are adhered to and the single central record is maintained and fully compliant
- The DSL will be informed of all disclosures and safeguarding concerns across the organisation.
- The DSL will ensure in partnership with the relevant Deputy Safeguarding Lead that protocols for implementing the LLC & DV8 Safeguarding Policy are agreed in writing with all external partners at the start of any delivery contract.
- The DSL will review safeguarding concerns and reports and provide quarterly updates to the Board of Directors.
- The DSL is responsible for ensuring that all appropriate safeguarding training is made available to all staff.

Any subsequent additions or changes to these responsibilities should be amended in their Job Description to clearly reflect these and SLT must ensure that sufficient time, training and support is put in place to enable the DSL to enact the additional responsibilities.

Deputy Safeguarding Leads

It is the role of the Deputy Safeguarding Leads across LLC & DV8 delivery location to ensure that all of the safeguarding procedures are followed within their centre or LLC & DV8 projects related to that centre and to report to the Designated Safeguarding Lead at LLC & DV8 in the instance of any concerns or disclosures.

The first point of contact for any safeguarding concerns will be the DSL, if they are unavailable the deputies or pastoral/wellbeing leads, or centre management team can be consulted. Additionally, it is the role of the Deputy Safeguarding Leads to ensure that all staff members (including temporary staff and volunteers) are aware of LLC & DV8's policy procedures and that they receive adequate training and support in this area.

Senior Leadership Team

The LLC & DV8 Senior Leadership Team is responsible for ensuring that LLC & DV8 Sussex follows safe recruitment processes and that enhanced Disclosure and Barring Service (DBS) checks and full references are obtained promptly for all staff that will have substantial and unsupervised contact with students.

Board of Directors

As stipulated in KCSIE 2025, Governing bodies, such as the board of Directors, have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to the KCSIE 2025 guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times. Governing bodies should have a senior board level (or equivalent) lead to take leadership responsibility for their college's safeguarding arrangements. Governing bodies should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. Their training should be regularly updated. Governing bodies should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Line Managers

Line Managers are responsible for ensuring that new staff and volunteers are inducted fully into the LLC & DV8 Safeguarding Policy and Procedures. All inductions should include information from the following LLC & DV8 departments: Centre Management (Operational processes), Safeguarding Team, Attendance and Engagement Officers, Heads of Curriculum, Principal/Director of Education & Skills (Organisational Mission, Vision, Values) and Finance /HR (Contract, Employment Handbook).

Line Managers will ensure that their staff have all attended Safeguarding training and completed the online training within the first month of starting employment and will ensure that any individual staff training needs regarding safeguarding are identified and addressed during staff member or volunteers' induction and that this is recorded on their induction paperwork.

All LLC & DV8 staff

All staff at LLC & DV8 are responsible for ensuring that their own conduct at work is always appropriate and within policy guidelines. *Staff Code of Conduct policy* will be clearly displayed in all LLC & DV8 centres. All staff are responsible for identifying concerns and passing them on to the Designated Safeguarding Lead at LLC & DV8. If any staff has concerns about the suitability of any staff member or volunteer to work alongside young people, this should be raised with the DSL immediately.

Staff are also expected to be responsible for recording concerns and Safeguarding information as per the LLC & DV8 Safeguarding system (MyConcern platform (DV8) or the Safeguarding Recording Template (LLC).

LLC & DV8 Staff should also be aware of the systems within the college which support safeguarding, these are to be explained at induction to new staff. This includes.

- Safeguarding and Prevent Duty Policy
- Behaviour Policy
- Staff Code of Conduct
- Low level Allegations Policy
- Safeguarding response to children who go missing from education

➤ Role of the Designated Safeguard Lead

Visitors and Guest speakers

All external speakers to LLC & DV8 will automatically be vetted making sure that they are not from a 'proscribed organisation' (an organisation that does not recognise freedom of speech/expression - as listed on the home office website).

All guest speakers prior to visiting will be expected to give staff an overview of what they will be discussing at the time and a staff member is always present at the time of delivery. All visitors will be required to sign in and out of the building and will have to always wear a visible ID badge whilst in the centre.

LLC & DV8 Safeguarding Panel

Aims & Objectives

1. To meet 2 times per week during term time to review and triage safeguarding concerns raised through MyConcern or other medium.
2. To meet regularly according to need but no less than every half term to review learning points for protection reports or concerns, assess safeguarding issues affecting the current students and action interventions and training accordingly.
3. To be accessible to every LLC & DV8 Sussex staff member (whether contracted, freelance or volunteer).
4. To be chaired by a Designated Safeguarding Lead, with panel members including the Deputy Safeguarding Leads.
5. To be an open and supportive forum that focuses on all elements of safeguarding, protection, learner and staff safety and pastoral care at LLC & DV8 Sussex.
6. To use each forum as a safe place to discuss policy, legislation, good/bad practice and as a place to get advice on safeguarding-in-practice at LLC & DV8 Sussex.
7. To regularly review the following subjects: e-safety, managing challenging behaviour, responding to disclosures of abuse, reporting thresholds, managing risk and local support services.
8. Meetings will observe client confidentiality and any information given on specific cases will only be as much as is needed to review LLC & DV8 practice.
9. All participants should feel able to ask any question about safeguarding practice without judgement.
10. Meetings will be minuted, without specifying names involved with any particular cases.

2. **PROTECTION PROCEDURES**

Any and all issues of concern about any students must be identified and recorded. LLC & DV8 follows the 5'R's process

1. Recognise - staff are aware and mindful of possible signs of concern / abuse
2. Respond - staff do not ignore a concern, staff respond with compassion and care.
3. Report - Staff speak to the DSL or Deputy DSL as soon as possible
4. Record – staff log a report on MyConcern (DV8) or the Safeguarding Recording Template (LLC).
5. Refer - DSL or deputy will refer unless they are not available and then staff may make an onward referral to relevant service

When to Act:

LLC & DV8 has a single streamlined system for reporting issues of concern. Staff need to use this system if they:

- A: See or hear something that concerns them
 or
 B: Receive a disclosure from a student
 or
 C: Receive a disclosure from a 3rd party - eg. another student, parent

All reports for pastoral and safeguarding concerns should be sent through the MyConcern platform. All staff members are set up as basic users, some staff has trusted user status, meaning they can be assigned cases to process.

Links to the triage flowchart, key persons and reporting flowchart can be found on appendix 2.

Staff must complete this form themselves and not pass information onto others to complete on their behalf.

In the absence of electronic means of communication or the inability to physically deliver a report, a telephone call should be made to the relevant Designated Safeguarding Officer to report the appropriate information.

Throughout these procedures is an emphasis on confidentiality and gaining consent to share information about sensitive issues. This is important and in line with best practice and government guidelines.

What Action to Take If You Have Concerns About A Child/ Student

Staff member	What action to take if you have concerns
Any member of staff, governor, volunteer, contractor or activity provider	<ul style="list-style-type: none"> ● Discuss your concerns with the Designated Safeguarding Lead, or in their absence, with the Deputy Designated Safeguarding Officer as soon as possible, before the student leaves for the day. It is important that the student is not sent home at the end of the day without taking the right protective action. ● Complete a MyConcern (DV8) or Safeguarding Recording Template (LLC) report and pass it to the Designated Safeguarding Lead (or a deputy in their absence). ● If the Designated Safeguarding Lead or their deputies are not available, you should contact the FDFP/ SPoA yourself. Inform the Designated Safeguarding Lead about what actions you have taken.
Designated Safeguarding Lead or Deputy	<p>You are concerned that the is at risk of significant harm (Level 4 Threshold Document)</p> <ul style="list-style-type: none"> ● Contact the Front Door For Families (FDFP) in Brighton & Hove, Single Point of Assistance (SPoA) East Sussex or Single Point of Contact (SPoC) in London immediately. ● If you believe that the learner is in immediate danger, or you suspect a crime has been committed, you must also contact the police immediately. <p>Brighton & Hove Helping Children & Families Threshold Framework -</p>

	<p>Threshold Framework (brightonandhovesafeguarding.org.uk) Threshold Guidance Croydon Safeguarding (croydonlcsb.org.uk)</p> <p>You believe the is not at risk of significant harm, but they or their family may need support (Level 2 or 3 Threshold Document)</p> <ul style="list-style-type: none"> • Use the Threshold Document to identify the level of need.
	<ul style="list-style-type: none"> • Discuss your concerns with senior colleagues in another agency, if necessary • If your consultation results in the decision that the student and their family are in need of help at Level 2 or 3 of the Threshold Document, provide additional support in the college and/or refer the young person, family to other agencies providing early help services. • Record all your consultations and decision-making on the MyConcern (DV8) Safeguarding Recording Template (LLC) report template sent by the staff member who contacted you originally. Update the chronology and add referral letters and forms to the students' file (These are digital files held on the MyConcern platform. Continue to update the file, including the chronology, as work progresses.

Dealing with A Disclosure Made by A student– Advice for All Members of Staff

If a student discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance.

- Understand that the student may not feel ready or know how to tell someone – you may be the first person they have spoken to
- Listen to what is being said without displaying shock or disbelief.
- Only ask questions when necessary to clarify, and without suggesting what the answer might be.
- Accept what is being said.
- Allow the student to talk freely – do not put words in the student's mouth.
- Reassure the student that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- Do not promise confidentiality –Stress that it was the right thing to tell.
- Do not criticize the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Inform the Designated Safeguarding Lead without delay.
- Complete the protection incident/welfare concern form and pass it to the Designated Safeguarding Lead.
- Dealing with a disclosure from a student and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Designated Safeguarding Lead.

If a student discloses that they have been a victim of sexual harassment, abuse or violence in line with the KCSIE 2025 recommends that:

- All staff should be able to reassure victims of such abuse that they are being taken seriously and that they will be supported and kept safe.
- The student should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- The student should never be made to feel ashamed for making a report.

SAFE STAFFING

It is important to remember that LLC & DV8's role is to support the young people on our programmes to achieve whilst with us, overcome barriers to learning, grow personally and progress positively following our courses.

We aim to:

- Provide a safe and welcoming environment.
- Provide support, advice and guidance to young people.
- Signpost young people to the correct statutory services.
- Refer to support agencies where appropriate.
- Provide a link between young people and other support agencies.

Support for any staff member who has had to deal with a distressing safeguarding disclosure / incident or situation will be given via their Line Manager and through supervision. If necessary, the staff member should request an additional supervision or support session with their Line Manager to discuss any issues affecting them personally and arising from a Child Protection concern.

Support can also be sought through the Education Support helpline: 08000 562561 or Employee Assistance Programme

Safer Recruitment

All staff and volunteers working at any LLC & DV8 site will be recruited safely in line with the LLC & DV8 Safer Recruitment policy and the DFE Keeping Children Safe in Education guidance.

Our job advertisements and application packs make explicit reference to our commitment to safeguarding students, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

Additionally online searches will be carried out as part of due diligence checks on shortlisted candidates /new members of staff who should be informed that this will take place.

At least one member on every shortlisting and interview panel will have completed safer recruitment training.

The Designated Safeguarding Lead is responsible for ensuring that our single central record of pre-employment checks is accurate and up to date

Any staff member (including volunteers) with previous convictions or concerns listed on an enhanced DBS check will be referred to the Principal at DV8 or Head of Education & Skills at LLC to approve employment or placement.

Other staff members who rarely work unsupervised with young people such as office support staff will also be expected to complete a full DBS check on employment by LLC & DV8.

Short term cover staff and volunteers who are with us for a short period of time (under 6 weeks)

will not necessarily require a full DBS check (and may not receive their completed check in time if applied for) can still work on LLC & DV8 programmes but must be supervised at all times by a member of staff who has been cleared by their HRM Manager to work unsupervised when in contact with young people or vulnerable adults. If the Principal/HRM Manager feels that this staff member will gain significant unsupervised access to young people through the programme and that it is not possible to supervise them at all relevant times, that person should not be asked to participate or work on the programme until these conditions can be met or their DBS check is processed fully.

Staff Code of Conduct

Staff and volunteers must maintain professional boundaries at all times and perform a support and guidance role impartially and objectively, meeting the needs of the students. It must be remembered at all times that LLC & DV8 staffs role is not to be the student's friends or confidantes and correct protocol and procedures must be followed in all contact made with students at LLC & DV8.

Staff members and volunteers should never give students any personal details such as personal phone number, personal email address, social media addresses, or home address. All staff should follow the LLC & DV8 Code of conduct for staff at all times.

If a staff member meets or sees a student unintentionally when outside the workplace contact should not be initiated by the staff member and must be kept to a minimum. Where possible the staff member should immediately leave the situation and avoid contact at all.

LLC & DV8 discourages the sharing of personal information such as sexuality, personal history, personal religious beliefs, past or present relationships, family and social life with students.

Relationships

Staff and volunteers are expected to develop positive, professional relationships with students that are based on openness, honesty, trust and respect. They must not engage in any personal relationships with course participants or meet with them in any context outside of LLC & DV8 hours. This is to protect staff, volunteers and LLC & DV8 from any accusations of inappropriate behaviour and must be observed at all times.

Staff Training

All staff and volunteers working with children and young people, or vulnerable adults will undergo mandatory introductory Safeguarding and Child protection online training followed by annual refresher and specialist CPD opportunities throughout the year.

This training will include:

- Basic definitions of abuse
- Signs and indicators of abuse
- Behaviour of abusers
- What to do if someone tells you they are being abused/at risk
- What to do if you suspect abuse/significant harm
- Mandatory Prevent agenda training
- Mandatory training for
- All DSL at LLC & DV8 will have completed recognised Designated Safeguarding Lead Officer training and *Local Safeguarding children's Partnership 'Working Together'* multi-agency training.

LLC & DV8 also provides staff with access to a comprehensive resource hub, with up-to-date guidance on safeguarding and child protection good practice and CPD opportunities around

safeguarding and pastoral issues. It is the responsibility of the Designated and Deputies Safeguarding Lead to keep this up-to-date.

CONFIDENTIALITY

Confidential information relating to a Child Protection cases should not be shared with any other members of staff or volunteers unless instructed by the DSL. Confidential information, such as names, addresses or other identifying characteristics should not be shared at any point with other personal contacts outside of LLC & DV8.

LLC & DV8 Sussex is committed to sharing referral information with learner's parents / carers unless to do so could place the learner at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from local authority social services or the police. Students, where at all possible, should be fully informed of what and where information about them is being shared.

- Any information relevant to a student's support and wellbeing imparted to you by a student at LLC & DV8 must be shared with the relevant line manager who will then decide how that information should be shared with other relevant LLC & DV8 staff members or stakeholders.
- Other project staff will be informed of relevant information in respect of individual cases regarding safeguarding on a "need to know basis". Any information shared with a member of staff in this way must be held confidentially by them.
- Where sharing will be in the best interests of the relevant student information will be shared with other support organisations or stakeholders
- However, outside of the LLC & DV8 staff team you have a legal responsibility to keep confidential any information relating to students at LLC & DV8 unless otherwise instructed by your line manager. This applies both during and after your time spent working or volunteering with LLC & DV8.
- Under no circumstances must a staff member promise to keep a secret for a student or collude with a student to conceal information.
- All students at LLC & DV8 must sign an agreement upon induction stating that they understand and agree to LLC & DV8's Confidentiality Policy.

HEALTH AND SAFETY

All staff have a duty to take reasonable care of health and safety whilst at work and that of their fellow staff members, volunteers and students. LLC & DV8's Health and Safety Policy and Procedures must be followed at all times and at all delivery locations.

WHISTLE BLOWING

We recognise that children cannot be expected to raise concerns in an environment where staff members do not do so. Therefore all staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in accordance with the LLC & DV8 employee handbook procedures.

PREVENT - Further information on Preventing Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and care, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). This came into force on 1 July 2015. The Prevent duty directs inspectors to examine an educational establishment's

response to extremist behaviour when considering the behaviour and safety of students, as well as the effectiveness of the leadership and management of the educational establishment in preventing extremism.

The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

Educational establishments and colleges which are required to have regard to Keeping children Safe in Education are listed in the Act as partners of the panel. The relevant provisions of the Act came into force on 12 April 2015 but many local authorities already have Channel panels set up in their area.

Channel Training

'Channel' is the name for the process of referring a person for early intervention and support, including:

- identifying people at risk of being drawn into terrorism
- assessing the nature and extent of that risk, and
- developing the most appropriate support plan for the people concerned.

The Channel process is about safeguarding children, young people and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert people away from risk before a crime occurs.

Prevent is the pan-Sussex strategy for preventing vulnerable people from being radicalised into violent extremism: The pan Sussex Prevent strategy describes partners' (including educational establishments) role in the Prevent agenda:

Sharing with colleagues:

- Promote awareness of the PREVENT strategy within your organisation and partners, including the local risks, roles and responsibilities involved in its delivery
- Ensure colleagues and partners are aware of how to report any potentially relevant information or concerns
- Promote an understanding amongst colleagues and partners of how to identify indicators of terrorism
- Promote an understanding amongst colleagues and partners of how to identify potential signs of individual vulnerability to radicalisation.
- Indicators of terrorist activity

The Department for education has published The Prevent Duty Departmental advice for educational establishments and care providers [here](#).

- All staff will complete the online ETF Prevent training as part of staff induction and refresher training annually.
- Staff leading on the prevent agenda have all attended 'prevent strategy' training from the local authority.
- Annual self-assessment for Prevent is carried out annually and shared with senior managers and the Southeast Prevent Coordinator.

RECORDS AND MONITORING

Well-kept records are essential to good safeguarding practice. LLC & DV8 Sussex is clear about the following:

- The need to be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- The confidentiality status of such records
- When these records should be passed/ shared with other agencies

All concerns are submitted and updated securely on the MyConcern. Concerns assessed to be of high priority and set at a risk level of High will be brought to the twice weekly safeguarding panel meetings.

Any hard copies of safeguarding forms must be kept in a confidential file, which is kept separate to other files and stored in a secure place at the relevant centre. The majority of files, however, will be held securely on MyConcern platform with access restricted to relevant staff members only.

If a student transfers from LLC & DV8 Sussex to another training provider, these files may be copied and forwarded to the student's new establishment marked confidential and for the attention of the designated safeguarding lead if this is deemed to be in the student's best interests.

An overview of safeguarding issues and incidents at LLC & DV8 will be shared with the Board of Directors at every meeting. These will be figures only to maintain the confidentiality of students concerned. Reporting will also cover any PREVENT Duty referrals or concerns.

ATTENDANCE AT SAFEGUARDING CONFERENCES AND CORE GROUPS

It is the responsibility of the DSL to ensure that LLC & DV8 is represented or a report is submitted to any safeguarding conference called for students on programmes at LLC & DV8 or previously known to them. Whoever attends should be fully briefed on any issues or concerns LLC & DV8 has and be prepared to make decisions on registration at the end of the conference. When a student is the subject of a safeguarding plan, it is the Designated Safeguarding Lead's responsibility to ensure that the student is monitored regarding their attendance, welfare and presentation.

If LLC & DV8 is part of the core group then the Safeguarding Lead should ensure that LLC & DV8 is represented at these meetings and that there is a record of attendance and issues discussed. All concerns about the safeguarding plan and / or the student's welfare should be discussed and recorded at the core group meeting unless the student is at further risk of significant harm before the meeting date. In this case the Safeguarding Lead must inform the student's key worker or social worker immediately and then record that they have done so and the actions agreed.

WORK EXPERIENCE PLACEMENTS

For students undertaking work experience off site LLC & DV8 will conduct a Safeguarding and safety audit and suitability vetting of the provider prior to sending students on placement. LLC & DV8 will provide guidance to placement providers as to appropriate action they should take if a student discloses to them.

LLC & DV8 will provide guidance to students who are on work placement as to action they should take if they have any concerns about their placement.

It will be recognised as good practice to have similar checks for all employees working with LLC & DV8 students.

CONTRACTORS

Contractors undertaking work at LLC & DV8 sites are required to:

- Conform to the LLC & DV8 Health and Safety and Safeguarding requirements
- All Contractors will be subject to the appropriate level of DBS check, including the requirement to hold an enhanced DBS check (including children's barred list information for all those engaged in regulated activity).
- All contractors are issued with a lanyard which they must wear whilst on the premises.

ONLINE SAFETY

Online safety covers issues relating to children and young people as well as adults and their safe use of the internet, mobile phones and other electronic communications technologies, both in and out of college. It includes education for all LLC & DV8 staff and learners about risks and responsibilities and is part of the 'duty of care' which applies to everyone working with young people.

As part of that duty of care, it is vital that there are clear roles, responsibilities and strategies in place at the college to ensure effective filtering and monitoring systems are in place. Filtering systems block access to harmful sites and content whilst monitoring systems identify when a user searches for harmful content and alerts the responsible staff member (DSL) so that they can intervene and respond swiftly.

To support a comprehensive understanding of online risks, LLC & DV8 adopts the **4 Cs framework** as outlined in KCSiE 2025. This framework categorizes online safety risks into four key areas:

1. content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, **misinformation, disinformation** (including fake news) and **conspiracy theories**.
2. contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
4. commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel students or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

In line with the KCSiE 2025 guidance, we will use the following tools to review and assess our digital safety and filtering and monitoring systems- Where redial actions are identified, these will be actioned timely.

- DfE Plan Technology for Your School Tool
- DfE's Generative AI in Education guidance and Cyber Security Standards.

RISK ASSESSMENTS

In order to safeguard students, all new project activities, as well as activities that take place outside of LLC & DV8 designated training centres, must be prepared for and risk assessed. All

risk assessments must take into account physical, emotional and psychological outcomes of risks and hazards – and must be signed off by a Centre Manager or the Head of Curriculum.

Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

Additionally, any students with medical considerations or social, emotional and mental health barriers will be risk assessed in order to ensure correct support is put in place. Information regarding these assessments will be shared with relevant staff and tutors on a need-to-know basis for the benefit of the learner.

Supporting students at risk

LLC & DV8 recognises that children and young people who have experienced neglect, abuse or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. In some circumstances it may be necessary to undertake a risk assessment for individual students to ensure that their time at LLC & DV8 is safe and that all student and staff are kept safe whilst at the LLC & DV8 centres.

LLC & DV8 may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at LLC & DV8 their behaviour may still be challenging and defiant or they may not actively participate.

LLC & DV8 will endeavor to support students through:

- The curriculum to encourage self-esteem and self-motivation as well as raising awareness of risks from exploitation and radicalisation.
- The organizational ethos promotes a positive, supportive and secure environment and which gives all students and staff a sense of being respected and valued.
- The implementation of LLC & DV8's Behaviour Management policies.
- A consistent approach agreed by all staff will endeavor to ensure the student knows that some behaviour is unacceptable, but s/he is valued.
- Regular liaison with other professionals and agencies that support students and their families.
- A commitment to develop productive, supportive relationships with parents and carers, whenever it is in the student's best interest to do so.
- The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- Recognition that, statistically, children with behavioral difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with students with profound and multiple disabilities, sensory impairment and / or emotional and behavioral problems will need to be particularly sensitive to signs of abuse.
- Recognition that in a home environment where there is domestic violence or drug or alcohol abuse, students may also be vulnerable and in need of support or protection.

ALLEGATIONS AGAINST STAFF

If you have information which suggests an adult who works with children and vulnerable adults (in a paid or unpaid capacity) has:

- behaved in a way that has harmed or may have harmed a child and/or vulnerable adult.
- possibly committed a criminal offence against, or related to, a child and/or vulnerable adult.
- behaved towards a child/child and/or vulnerable adult/s in a way that indicated s/he is unsuitable to work with children and/or vulnerable adults.

Reporting an allegation against a staff member

Where an allegation or complaint is made against a staff member, including volunteers, supply staff and contractors, the matter should be reported immediately to the DSL. The DSL will ensure that the allegation is discussed immediately with the CEO/Deputy Designated Safeguarding Lead (DDSL) before further action is taken.

Where an allegation is made against the DSL, the matter should be reported immediately to the DDSL, CEO or the Safeguarding NED. If the matter is reported to the DDSL or Safeguarding NED, they must ensure that the CEO is notified immediately. The CEO will ensure that if required, the allegation will be discussed with the Local Authority Designated Officer (LADO) before further action is taken.

Where an allegation or complaint is made against the CEO, the matter should be reported immediately to the Safeguarding NED and the Chair, without first notifying the CEO. If required a referral will be made to the LADO.

The member of staff against whom the allegation is made will be kept informed about the allegation and the progress of the complaint, unless to do so may cause the risk of harm to the complainant.

If after discussion with the LADO it is decided that a referral to local authority social services or police is not appropriate, it may still be necessary to address matters in accordance with the LLC & DV8's disciplinary procedures.

Where LLC & DV8 takes action to terminate its relationship with the individual concerned due to behaviour or actions which harmed or could have harmed a student we will refer their name to the Disclosure and Barring Scheme for consideration of inclusion on the barred persons list, in line with current guidance. Inclusion in this list disqualifies individuals from working or seeking work with adults at risk and/or children and young people.

Low level Concerns

What is a low-level concern

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that a staff member, or anyone working on behalf of LLC, may have acted towards a learner in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the harms threshold, as set out above (3.1), or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour may include, but are not limited to:

- being over friendly with learners.
- having favourites.
- taking photographs of learners on their mobile phone.
- engaging with a learner on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Any low-level concern about a staff member, including volunteers, agency, and contractors, should be referred to the DSL or DDSL. If there are concerns about the DSL, these should be raised with the

CEO. The LADO can also be consulted on a no-named basis. The CEO must be informed of all low-level concerns and make the final decision, in consultation with the DSL, on how to respond.

POLICY REVIEW

The LLC & DV8 Designated Safeguarding lead is responsible for ensuring the annual review of this policy. Previous versions of the policy are to be kept demonstrating progress and developments made.

Appendix A - Child Protection and Safeguarding Procedures

1 Definitions

- Abuse, including neglect and exploitation is a form of maltreatment. A person may abuse a child by inflicting harm or by failing to prevent harm. Children may be abused within their family, in an institutional or community setting, by those known to them, or, more rarely, by a stranger.
- Children are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger.
- Child protection is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm.
- Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.
- Harm is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- Safeguarding children is the action we take to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of children (July 2018)* as:
 - protecting children from maltreatment;
 - preventing impairment of children's health and development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.

Significant harm is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his/her health or development shall be compared with that which could reasonably be expected of a similar child.'

Categories of Abuse

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development or mental health. It may involve:

- making a child feel worthless, unloved or inadequate
- only there to meet another's needs
- inappropriate age or developmental expectations
- overprotection and limitation of exploration, learning and social interaction
- seeing or hearing the ill treatment of another, e.g. domestic abuse

- making the child feel worthless and unloved - high criticism and low warmth
- serious bullying (including cyber bullying)
- exploitation or corruption

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect is the persistent failure to meet a 's basic physical or psychological needs, likely to result in the serious impairment of the 's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent 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
- ensure access to appropriate medical care or treatment

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

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning, 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.

Physical abuse is not solely perpetrated by adults. children can also commit acts of physical abuse.

- Sexual abuse

Sexual abuse covers a broad range of harmful behaviors, and it is important that all staff, students and parents understand, recognise and can name the different harmful sexual behaviors:

Sexual abuse involves forcing or enticing a child or student to take part in sexual activities, including prostitution, whether or not they is aware of what is happening. Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts. They may include non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

Some definitions:

Harmful sexual behaviour - 'experimentation that unintentionally goes too far, through to serious sexual assault' (*Stop it Now!*)

Sexual violence: Sexual offences under the Sexual Offences Act 2003. This includes rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent.

Sexual assault: 'A person (A) commits an offence if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not

reasonably believe that B consents.

A child under the age of 13 can never consent to any sexual activity'.

Sexual harassment: 'sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.' (DFE 2021) 'Unwanted or unwelcome behaviour of a sexual nature that interferes with your right to receive an equal educational opportunity' (Stein, 1999).

Bullying - 'the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power' (*Anti-Bullying Alliance*)

Shore Space (<https://www.shorespace.org.uk>) is a confidential resource for young people concerned about sexual behaviour. Staff should be aware of this support option and share it with learners where appropriate.

Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm as identified in *Keeping children Safe in Education 2025*. The *Pan-Sussex & The London Child Protection and Safeguarding Procedures* has detailed information about local procedures for some specific issues.. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Below are some safeguarding issues all staff should be aware of. Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' abuse- including female genital mutilation (FGM), forced marriage, and practices such as breast ironing
- Radicalisation
- Peer on peer abuse – bullying and cyberbullying
- Peer on peer abuse – physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Peer on peer abuse – initiation/hazing type violence and rituals
- Peer on peer abuse – sharing of nudes/semi nudes images or videos (youth produced sexual imagery)
- Peer on peer abuse – sexual violence and sexual harassment
- Substance Misuse (drugs and alcohol)
- Truancy (deliberately missing education)

KCSiE 2025 Part A contains important additional information about some specific forms of abuse and safeguarding issues:

KCSIE 2025 Part 5 covers child on child sexual violence and sexual harassment.

- Brighton & Hove Local Safeguarding Children's Partnership has additional information and guidance on some of these issues at:

<https://www.bhscp.org.uk/preventing-abuse-and-neglect/keeping-children-safe/?highlight=specific%20safeguarding%20issues>

East Sussex Local Safeguarding Children's Partnership has additional information and guidance on some of these issues at:

<https://sussexchildprotection.procedures.org.uk/page/contents#p5>

LONDON Safeguarding Children Partnerships has additional information and guidance on some of these issues at

[Contents \(londonchildprotection.procedures.org.uk\)](https://londonchildprotection.procedures.org.uk/page/contents#p5)

Recognition – What To Look For

- Staff members should refer to the detailed information about the categories of abuse and risk indicators in the *Pan-Sussex Child Protection and Safeguarding Procedures* for further guidance.

In an abusive relationship, the child may:

- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups

In an abusive relationship, the parent or carer may:

- persistently avoid health services and treatment of the 's illnesses
- have unrealistic expectations of the
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated
- Serious case reviews have found that parental substance misuse, domestic abuse and mental health problems, sometimes referred to as the 'toxic trio', if they coexist in a family could mean significant risks to children. Problems can be compounded by poverty; frequent house moves or eviction.
- Staff should be aware that children with special educational needs and disabilities can face additional safeguarding challenges including:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability
 - children with special educational needs and disabilities are particularly vulnerable to bullying and often show no outward signs
 - communication issues can be a barrier to effective safeguarding

2 Peer on Peer Abuse – Managing Allegations of Abuse Made Against Other children

- At LLC/DV8 we believe that all students have a right to attend and learn in a safe environment. Students should be free from harm by adults and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of

others and their behaviour will be dealt with under the college's Behaviour Policy or Anti-Bullying Policy when appropriate.

We are mindful of the need to follow published guidance and to seek advice and support from other professionals when appropriate. We will report directly to police when guidance indicates that a criminal offence may have been committed.

- Peer-on-Peer Safeguarding allegations

It is important to remember that Peer-on-Peer Abuse does not occur in a vacuum. It occurs in a society where there are structures and norms that shape young people's views, experiences and behaviours, as well as responses to them. Consequently, there are different issues of gender that will need to be considered when responding to allegations made against students by others in the college, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student

- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the college
- indicates that other students may have been affected by this student
- indicates that young people outside the college may be affected by this student

Examples of safeguarding issues against a student could include:

- Physical Abuse
- violence, particularly pre-planned
- forcing others to use drugs or alcohol
- Emotional Abuse or extortion
- threats and intimidation
- Sexual Abuse
- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting
- Sexual Exploitation
- Encouraging other children to attend inappropriate parties
- Photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older students may attempt to recruit younger students using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

- Minimising the risk of safeguarding concerns towards students from other students

We will provide a developmentally appropriate Personal and Social Development (PSD) syllabus which develops students' understanding of acceptable behaviour and keeping themselves safe.

Have systems in place for any student to raise concerns with staff, knowing they will be listened to, believed and valued.

Deliver targeted work on assertiveness and keeping safe to those students identified as being at risk.

On occasion, some students will present a safeguarding risk to other students. The college should be informed that the student raises safeguarding concerns, for example,

they are coming back into college following a period in custody or they have experienced serious abuse themselves.

These students will need an individual risk assessment and risk reduction plan to ensure that other students are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

- What to do

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the college's safeguarding referral process and if appropriate, SHAV Procedure. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

The Designated Safeguarding Lead should make a referral to the Front Door For Families or Single Point of Access, as appropriate. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and advice sought from them on appropriate follow-up in college. Unless other professionals advise otherwise the college will inform parents (of both the student being complained about and the alleged victim).

Children's Services Threshold Document

- The Children's Services Threshold Document has been developed so that everyone working with children in Brighton and Hove has a common language for understanding the needs and risks surrounding children and their families.
- For example, if the college has concerns about a child and needs advice or support from the Front Door For Families, they will use the Threshold Document as a guide to understand the college's concerns and provide advice about what to do or to decide whether the child and family need social care involvement. The Threshold Document does not replace professional judgement, but it is intended to support decision-making and discussions between services and practitioners.
- It is important that staff members are familiar with the Threshold Document, which can be accessed at <https://www.brightonandhovesafeguarding.org.uk/threshold-framework/> or [https://www.eastsussex.gov.uk/children-families/professional-resources/continuum-of-need/about/Threshold Document: Continuum of Help and Support \(londonsafeguardingchildrenprocedures.co.uk\).](https://www.eastsussex.gov.uk/children-families/professional-resources/continuum-of-need/about/Threshold Document: Continuum of Help and Support (londonsafeguardingchildrenprocedures.co.uk).)
- The Threshold Document shows that a student's or family's additional needs can be on a range from none to very high, and that needs can shift from early help to child protection and back to preventative early help. It covers children whose needs are increasing as well as children whose needs are decreasing after children's Social Work Services involvement. The Threshold Document will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the safe.
- The Threshold Document identifies four levels of need.

Level 1:

- children who are achieving expected outcomes
- their needs are met by their parents and by accessing universal services such as health and education

- they do not have additional needs

Level 2:

- children with additional needs
- parents need professional support or guidance to help them meet their children's needs
- extra support can usually be provided by agencies that already know the family, e.g. their pre-college, college or college or NHS community services such as Health Visiting

Level 3:

children with multiple and complex needs

- children and parents need targeted early help or specialist services to meet the children's needs
- needs are met through multi-agency support and the use of Early Help Plans

Level 4:

- children with acute needs, including those in need of protection
- children and parents need multi-agency responses which include specialist intervention from children's Social Work Services through the family assessment process
- By referring to the Threshold Document, the college can identify when assessment and support for a child and family need 'stepping up' to a referral to Social Work Services and when the needs of a child and their family have been reduced enough for them to be 'stepped down' to early help services.

Discussing Concerns with the Family and the Child– Advice for the DSL

- In general, you should always discuss any concerns the college may have with the 's parents. They need to know that you are worried about their child. However, you should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.
- If you make a decision not to discuss your concerns with the 's parents or carers this must be recorded in the child's protection file with a full explanation for your decision.
- It is important to consider the 's wishes and feelings, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.
- When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a disabled child may need support in communicating.
- How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from the Front Door For Families/ SPOA or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.
- If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality.
- It is expected that you discuss your concerns with the parents before making a referral to the Front Door For Families or SPOA, unless you consider that this would place the child at increased risk of significant harm.
- Parents will ultimately be made aware of which organisation made the referral.

3 Early Help for children and Families

- Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our college or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.
- Our college will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard children 2023* and local guidance, to any child who needs it. We will pool our knowledge within the college and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the Threshold Document to identify what level of need the child or their family has.
- We will work closely with targeted early help services, via the Front Door For Families/ SPOA, and children's Social Work Services if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.
- Early help support is accessed by making a referral to the Front Door For Families/ SPOA. Consent for this will need to be gained from the family first.
- Our college will work with other services in early help planning and coordination of interventions to meet young peoples and families.

4 **Children's Services Responses to Concerns About Abuse**

- Once children's Social Work Services has accepted our referral as needing a social-care- led response (Level 4 of the Threshold Document), a senior social work practitioner and their manager will evaluate the concerns to identify the sources and levels of risk and to agree what protective action may be necessary.
- The evaluation of concerns and risks involve deciding whether:
 - the child needs immediate protection and urgent action is necessary; or
 - the child is suffering, or at risk of suffering, significant harm and enquiries need to be made under section 47 of the children Act 1989; or
 - the child is in need and should be assessed under section 17 of the children Act 1989.
- We will cooperate with children's Social Work Services and the police in any emergency action they take using their legal powers for immediate protection of the child. This may involve removing the child from their home.
- We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.
- We will share information about the child and their family for section 47 enquiries and family assessments undertaken by children's Social Work Services.
- We will ensure that a relevant staff member participates in all initial and review child protection conferences, if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome-focused child protection plan and will ensure that the 's wishes and views are considered in their own right in planning.
- If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in all core group meetings.
- We will ensure that we complete all actions allocated to us as part of the outcome-

focused plan, whether a child protection plan or a family support plan, in a timely way.

- We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.
- Information Sharing and Consent It is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.
- The college may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by children's Social Work Services.
- We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.
- The Data Protection Act 1998 and the General Data Protection Regulation are not a barrier to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.
- We should be sharing any concerns we have with parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.
- Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.
- Try to get consent from parents (or the child, if they have sufficient understanding) to share information, if possible. However, you do not need consent if you have serious concerns about a child's safety and well-being.
- Consent is not necessary in cases where children's Social Work Services are making child protection enquiries under section 47 of the children Act 1989. Information needs to be shared with children's Social Work Services; staff members must make sure to record what information has been shared.
- Consent is necessary for:
 - children's Social Work Services investigations or assessments of concerns under section 17 of the children Act 1989. children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker at the Front Door For Families/ SPOA.
 - Early Help Assessments. Assessments are undertaken with the agreement of the child and their parents or carers.
- If you are in any doubt about the need for seeking consent, get advice from the Designated Safeguarding Lead.
- Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

5 Record Keeping

- Good record keeping is an important part of the college's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children.

- Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included, this must be made clear. Where people are referred to, they should be identified clearly by role. Records should support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.
- The Designated Safeguarding Lead will ensure that records are maintained appropriately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

Professional Challenge and Disagreements

- Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.
- We will promote a culture within our college that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of child protection in the college. This may include raising concerns about decisions, action and inaction by colleagues about individual children. If necessary, staff members will speak with the Designated Safeguarding Lead, the Principal, the chair of governors or with the Local Authority Education Safeguarding Officer.
- Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.
- If there are any professional disagreements with practitioners from other agencies, the Designated Safeguarding Lead or the Principal will raise concerns with the relevant agency's safeguarding lead in line with guidance in the *Pan-Sussex Child Protection and Safeguarding Procedures*.
- If the college disagrees with the child protection conference chair's decision, the Designated Safeguarding Lead or the Principal will consider whether they wish to challenge it further and raise the matter with the children's Services Head of Safeguarding.

APPENDIX 1 KEY CONTACTS

Designated Safeguarding Team

Role	Name	Contact details
Designated Safeguarding Lead & Prevent Officer (LLC & DV8 Sussex)	Pam Wallace	p.wallace@londonlc.org.uk 0208 774 4040
Deputy DSL and Prevent Officer (Brighton)	Nicola Lombardo Assistant Principal Student Experience	n.lombardo@londonlc.org.uk 01273 550432
Deputy DSL (Bexhill & Brighton)	Dave Pine Vice Principal	d.pine@londonlc.org.uk 01424 213890/01273 550432
Deputy DSL London	Vacant Post – recruitment underway	Vacant Post – recruitment underway

Local Authority Contacts for Child Protection And Safeguarding – SUSSEX

Local Authority Designated Officer – LADO (Staff allegations only)	Brighton & Hove – Kay Whitcroft kay.whitcroft@brighton-hove.gov.uk	01273 295643
	East Sussex – Sam Efde Sam.efde@eastsussex.gov.uk	01323 466606 07958 662072
	West Sussex – Miriam Williams /Donna Tomlinson/Victoria Williams Miriam.williams@westsussex.gov.uk Donna.tomlinson@westsussex.gov.uk Victoria.williams@westsussex.gov.uk LADO@westsussex.gov.uk .	0330 222 6450
Children’s Social Care – for all referrals	Brighton & Hove City Council <i>Front Door for Families</i> <i>Phone: 01273 290400</i> FrontDoorforFamilies@brighton-hove.gov.uk	01273 290400 (Out Of Hours Duty Service 01273 335905)
	East Sussex County Council <i>Single Point of Advice (SpOA)</i> <i>Mon-Thurs 8.30am-5pm and Fri 8.30am-4.30pm.</i> <i>Phone: 01323 464222</i>	01323 464222 (Out Of Hours Duty Service 01273 335906/ 01273 335905)

	Email: 0-19.SPOA@eastsussex.gov.uk	
	West Sussex County Council <i>West-Sussex's Integrated Front Door</i> Monday to Friday between 9am-5pm <i>Phone: 01403 229900</i> <i>Email:</i> https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/request-support-or-raise-a-concern-about-a-child/	01403 229900 Out of hours' emergency team: 0330 222 6664
Prevent East Sussex	Dave Law Prevent Project Officer David.law@eastsussex.gov.uk	
Prevent Brighton	Nahida Shaikh Prevent Lead Officer Nahida.Shaikh@brighton-hove.gov.uk	

Local Authority Contacts for Child Protection And Safeguarding – LONDON

Service	Contact Details
Croydon Prevent Coordinator Croydon	Tel: 020 8726 6000 x 62070. Mob: 07562 438898. E-mail: Haydar Muntadhar haydar.muntadhar@croydon.gov.uk Cordelia Shaw – Croydon Prevent Education Co-ordinator – email 30ordelia.shaw@croydon.gov.uk
Croydon Single Point of Contact – urgent same day intervention by Social Worker	Croydon Single Point of Contact - 0208 255288 For Urgent Action out of Hours call 0208 726 6400 – this is the number for the emergency social work service for urgent child protection matters that cannot wait until the next working day
Croydon Safeguarding Children Partnership, , web: http://croydonlscb.org.uk	email: SafeguardingChildrenBoard@croydon.gov.uk tel: 0208 604 7275
Croydon MASH Team	Tel: 020 8726 6400, Email: childreferrals@croydon.gov.uk
Croydon LADO	LADO Service Manager Steve Hall : steve.hall@croydon.gov.uk Telephone: 020 8726 6000 Ext 24334 Mobile: 07825 830328 LADO Jane Parr : jane.parr@croydon.gov.uk Telephone: 020 8726 6000 Ext 24817 Mobile: 07716 092630 Email: LADO@croydon.gov.uk

	Karen Anns (Business Support Coordinator) 0208 726 6000 Ext 23981
FE/HE Regional Prevent Coordinators for London	07795 454 722 Jennie Fisher j.fisher@education.gov.uk
Channel email	Channel@croydon.gov.uk

Other Services

Anti-terrorist hotline	0800 789 321
Forced Marriage Unit	www.fco.gov.uk/forcedmarriage or 020 7008 0151
Honour Based Violence Helpline	0800 99 9247
National Domestic Abuse Helpline	0808 2000 247
Metropolitan Police Service	0300 123 1212
London Safeguarding Children Board	020 7934 9714

APPENDIX 2 LINKS TO KEY DOCUMENTS

DOCUMENT	DV8	LLC
Safeguarding & Wellbeing key persons	Safeguarding and wellbeing key persons 2024.png	LLC X DV8 SAFEGUARDING POSTER.pdf
Safeguarding Reporting Flowchart	Safeguarding Reporting Flowchart 2024-25.pdf	LLC SAFEGUARDING FLOW CHART.pdf
Safeguarding Reporting Triage	Safeguarding Reporting Triage 2024-25.pdf	LLC Triage

APPENDIX 3

Table of changes from KCSIE September 2024 version

Summary About the guidance (no changes made)

Part one Safeguarding information for all staff (no changes made)

Part two The management of safeguarding

- Page 36 Para 129 We have added a note to say that revised guidance on Relationships, Sex, and Health Education was published July 2025 for introduction September 2026
- Page 38 Para 135 Updated to clarify misinformation, disinformation and conspiracy theories are safeguarding harms.
- Para 136 Removed hyphen from antisemitism
- Page 40 Para 143 – Link added to the plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.
- Page 41 Para 143 - Link added to DfE guidance on the use of generative AI in education (2025) at end of filtering and monitoring (FM) section to support schools and colleges.
- Para 144 – wording amended in the cybersecurity standards for schools and colleges advice to clarify that it was developed to help schools improve their cyber resilience.
- Page 47 Paras 168-170 information added to clarify that it was developed to help schools improve its cyber resilience.
- Page 49 Para 177 – updated to clarify 'working together to safeguard attendance' 'is now 'statutory' guidance.
- Pages 50 & 51 Paras 184-187- updated to remove references to funding grant support for SMHLs training as this programme has ended
- Page 52 Para 190 split into paras 189 and 190 for cosmetic reasons only (to retain paragraph numbering)
- Page 54 Para 199 has been amended to clarify that the role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.
- Page 56 Para 205 removal of 'spectrum' and 'disorder' to align with the SEND code of practice.
- Updated note: We expect to publish the revised guidance on gender questioning children soon. Once published we will signpost to this guidance in KCSIE 2025.

Part three Safer recruitment

- Page 73-74 Para 260 reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
- Page 75 Para 266 references to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
- Page 85 Para 319 reference to Employer Secure Access removed and replaced with link to GOV.UK for S128 checks.

Part four Safeguarding concerns or allegations made about staff, including supply

teachers, volunteers and contractors

- Page 106 Para 422 amended to correct the title of the Information Commissioner's employment practice guidance.

Part five Child-on-child sexual violence and sexual harassment

- Page 140 Para 545 – Link added to the Lucy Faithfull Foundation's 'Shore Space'. which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Annexes A, B, C, D and E

- Annex B – page 157 We have updated the definition of extremism on page 157 to reflect the definition used within the Prevent guidance
- Annex B – Page 163 Link added to the CSA Centre's Supporting practice in tackling child sexual abuse.
- Annex B – Page 164 Link added to the Preventing Child Sexual Exploitation | The Children's Society.
- Annex B – Page 167 & 170 Updated links to National Crime Agency and CEOP following rebranding (Thinkuknow has been retired and replaced with CEOP Education)