

Safeguarding Policy 2026-2027

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1. Purpose

The purpose of this policy is to inform staff, trustees, visitors, volunteers, contractors and subcontractors of the safeguarding arrangements in place at South Bank College. The policy demonstrates the College commitment to safeguarding the young people and vulnerable adults who are part of the wider college community.

The policy demonstrates the processes and procedures that are followed if any safeguarding vulnerabilities are identified, including any terrorism related activity, and that appropriate action will be taken.

Our staff team understand that safeguarding is everyone's responsibility and follow the statutory guidance and processes within this policy to ensure that the college is a safe environment for all students, staff and visitors.

1.1 Introduction

The term 'safeguarding children, young people and adults at risk' covers both reactive child protection and a preventative approach to keeping young children and adults safe. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or 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.

South Bank Colleges recognises that safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility, and that the best interests of the child must be paramount. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm in our care, but also a moral duty. It adopts a child centred approach which operates in the best interests of the child.

1.2 Scope

This policy protects young people and vulnerable adults. A young person is described as someone who is under the age of 18 years old, and a vulnerable adult is a person who needs support from others due to health care, personal care, assistance in general household matters, assistance in the conduct of their own affairs or conveying. A young adult (up to the age of 24 years old) with an educational health care plan is classed as a young person for safeguarding and child protection purposes.

A vulnerable person is a person who has any of the following characteristics (this list is not exhaustive) and a young person can become a vulnerable person at any time.

- Is a looked after child
- Is a care leaver
- Is a young carer
- Has a criminal conviction or a parent who is in prison
- Has special educational needs or disability
- Has mental health disorders
- Has been involved in drug or alcohol misuse
- Has suffered from or witnessed domestic violence
- Has suffered from or witnessed sexual assault
- Has communication barriers
- Has social, emotional or developmental needs
- Has a physical or sensory disability

The College's safeguarding commitment for young people and vulnerable adults is to

provide the following

- Promoting safeguarding throughout the college community to staff, students and parents
- Providing help and support as soon as need arises
- Protecting young people and vulnerable adults from abuse, inside and outside the home and online
- Promoting self-development and self-care through tutorial provision
- Creating a whole college community which works with families and professionals to support young people and vulnerable adults
- Working to the Keeping Children Safe in Education (KCSiE) 2026 and Working Together to Safeguard Children 2026 statutory guidance
- Having well trained staff who are qualified to support young people and vulnerable adults with welfare and safeguarding needs
- Provide a calm, inclusive and safe environment for all learners in the college
- Ensuring that all relevant safety checks are completed for anyone employed by or contracted to the college

This policy is applicable to all departments and buildings that are part of South Bank Colleges.

2. Statutory Framework

The college will always work in accordance with the legislative requirements that are in place to protect young people and vulnerable adults from harm.

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Safeguarding Vulnerable Groups Act 2006
- Prevent Duty Guidance 2023
- The Children Act 2004
- The Education Act 2002
- The Children and Social Work Act 2017
- The equality Act 2010
- The Human Rights Act 1998

2.1 Prevent Duty

The Prevent duty guidance for Further Education institutions in England and Wales 2023 requires all education providers 'to help prevent the risk of people becoming terrorists or supporting terrorism'. This includes safeguarding learners from extremist ideologies and radicalisation.

The college considers the needs of children, young people and adult learners at each stage of the safeguarding process and considers radicalisation concerns in line with our existing safeguarding processes, skills and experience.

All staff in the college are committed to look out for concerning changes in behaviour relating to Prevent and will report them to the Designated Safeguarding Lead (DSL) if they have any concerns. All concerns are recorded on the college safeguarding platform CPOMS.

The college has a Prevent risk assessment which is updated annually and signed off by the local authority Prevent lead. The college also uses the Guidance from Gov.UK 'Managing risk of radicalisation in your education setting' The link and information can be found [here](#).

The college has built partnerships with the following stakeholders to understand the local risks and threats in our area

- local authority Prevent lead
- local authority Prevent education officer (if you have one)
- DfE regional Prevent coordinator
- local authority children or adult services
- safeguarding children partnership
- local policing team (search on your local police website)

All staff receive Prevent awareness training on an annual basis as part of the whole college safeguarding training for staff as well as training from the Prevent team every two years.

3. Roles and responsibilities

Principal and CEO			
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Safeguarding Trustee			
Name:	Chris French	Email:	CFrench@southbankcolleges.ac.uk
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Designated Safeguarding Lead (DSL)			
Name:	Mary Prince	Email:	MPPrince@southbankcolleges.ac.uk
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Designated Teacher for Looked After Children (LAC)			
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3.1 The role of the Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Lead (DDSL)

The role of the DSL in the college is a senior member of the college leadership team. The DSL has lead responsibility for safeguarding and child protection. The DSL has the appropriate status and authority in the college to carry out the duties required of the post.

The DSL chairs the Safeguarding strategy meetings within the college and represents the college in the wider group safeguarding committee meetings, as well as being part of the quality and improvement board meetings.

The DDSL is the safeguarding and welfare manager in the college. The post holder is the designated teacher. The DDSL manages a team of safeguarding officers in the college and is the first point of contact for safeguarding.

The DSL and DDSL are available in term time in person or via Teams across college sites. During a period of absence, the DDSL will cover for the DSL and vice versa.

The College website has a dedicated page for safeguarding support out of hours or during college holiday periods. Students and parents are also provided with regular updates throughout the academic year.

- 3.2 The role of the Principal and CEO/ Trustees – The Principal/CEO/Trustees are responsible for ensuring that they have strategic leadership responsibility for their college safeguarding arrangements and must ensure that they comply with legislation. They must read the Keeping Children Safe in Education (KCSiE) document in full and ensure that the college policies and procedures comply with the law at all times.

The Board of Trustees at the college has a safeguarding lead who works closely with the DSL and the Principal/CEO.

3.3 The role of all staff – Is to

- Read the KCSiE part 1 every September when new guidance is released.
- Remember that safeguarding is everyone's responsibility
- Follow the college safeguarding policy and procedures
- Complete annual all staff safeguarding training
- Complete mandatory safeguarding and Prevent training
- Report anything to the safeguarding team that they observe as a concern or possible concern

4. Types of Abuse

Abuse is a form of maltreatment of a child, young person or vulnerable adult. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context 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 another child or children. The College recognises the following as definitions of abuse for young people and adults at risk of harm, physical, emotional, neglect, sexual abuse and exploitation, emotional abuse and financial.

- Physical abuse
- Neglect
- Sexual abuse and exploitation
- Emotional abuse
- Racism & Faith Targeted abuse

- Financial abuse/modern slavery

4.1 Physical Abuse - this may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

4.2 Neglect - The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

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

A young person being absent from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with young people and vulnerable adults that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

4.3 Sexual Abuse and Exploitation - sexual abuse involves a young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the young person or vulnerable adult to be aware that the activity is sexual, and the apparent consent of the young person or vulnerable adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

4.4 Emotional Abuse - emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the young person and vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

4.5 Faith Targeted abuse -All staff recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

4.6 Financial Abuse – Financial exploitation/modern slavery is where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

4.7 Significant Harm - some young people may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the young person and vulnerable adult. Harm can also 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 young people

of all forms of domestic abuse which can include psychological, physical, sexual, financial and emotional. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Domestic abuse can have a detrimental and long-term impact on a young person's health, well-being, development, and ability to learn.

4.8 Serious Violence - All staff should be aware of the indicators, which may signal young people 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 young people 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 maltreatment and having been involved in offending, such as theft or robbery.

4.9 Child on Child Abuse - child-on-child abuse is a significant issue (Part 5 of KCSIE 2026).

It must never be tolerated, dismissed or ignored. Whilst child-on-child abuse disproportionately affects females and the College must have appropriate support mechanisms in place, males, LGBTQ+ and SEND students will also be affected by this issue and staff must be aware of this and prepared to act accordingly.

Child-on-Child abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment. All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL and reported in the Safeguarding Report for Trustees to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Most cases of students hurting other students will be dealt with under our College's Attendance and Behaviour Policy, however, this safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- It is serious, and potentially a criminal offence.
- Could put students at the college at risk.
- It is violent.
- Involves students being forced to use drugs or alcohol.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Involve sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate nude and semi-nude images, pictures or videos (also known as sexting or youth produced sexual imagery)
- abuse in intimate personal relationships between peers.
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual

harassment.

- non-consensual sharing of nudes and seminude images and/or videos,
- 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.
- 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.
- 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 college's policy and procedures with regards to child-on-child abuse and sexual abuse and harassment and the important role they have to play in preventing it, ensuring a zero-tolerance culture and responding where they believe young people and vulnerable adults may be at risk.

The college will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our tutorial provision helps to educate students by following the PSHE education framework which includes sessions about healthy relationships, appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially and are clear what actions will be taken in response to a disclosure
- Ensuring staff are trained to understand that a student harming a student could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy
- Taking intervention or disciplinary action and imposing a penalty accordingly on a case-by case basis

4.10 Child Sexual Exploitation/Child Criminal Exploitation - CSE is a form of 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 young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse including via the internet.

Child Criminal Exploitation - Some specific forms of CCE can include young people 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.

Young people and vulnerable adults 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 young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older young people), 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.

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

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

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 young person 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 young people, both male and female and can include young people who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of young people and vulnerable adults: county lines guidance.

- 4.11 Consensual or Non-consensual making or sharing of nude and semi nude images or videos, Including where generated by AI.** - This refers to the creation, sending or posting of nude or semi-nude images of young people under the age of 18. The term images includes all visual content, such as photographs, videos and live streams. Images can be taken by the child themselves (self generated imagery) or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are also known as 'deepfakes' or 'deepnudes'.

if staff are made aware of such an incident (also known as 'youth produced sexual imagery'), they must report it to the Safeguarding Team immediately.

Staff must not:

- View, download or share the imagery yourself, or ask a student to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Manager.
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the Safeguarding Officer's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident and reassure the student that they will receive support and help from the Safeguarding Officer.

If further detailed information is required read Part five alongside the Departmental advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.
<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

4.12 Mental Health – Is the highest category at the college for reported safeguarding concerns that meet the threshold, year on year. College staff are trained and aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students 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. The college has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how to report mental health concerns about a student and that the college can access a range of advice to help them identify students in need of extra mental health support; this includes working with external agencies.

The college is committed to promoting strong mental health by promoting good mental wellbeing throughout the tutorial programme, the curriculum and support services. The college staff team have had repeated training to be able to observe students and identify signs of mental health problems or be at risk of developing poor mental health. The college safeguarding team supports students with poor mental health and the college has a team of counsellors and works closely with the Lambeth Mental Health Support Team (MHST) and other external agencies.

4.13 Additional safeguarding risks for students includes the following.

- Young person absent from education
- Young person missing from home or care
- County lines
- Grooming, exploitation, radicalization & money laundering
- Domestic violence
- Drug or alcohol abuse
- Fabricated or induced illness
- Honour or faith based abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate crimes
- Missing young people and vulnerable adults
- Private fostering
- Relationship abuse
- Trafficking

5 Vulnerable student groups

5.1 Children with Special educational needs, disabilities or health issues –

Studies have shown that students with SEND are 3.8 times more likely to be neglected

or physically abused, 3.1 times more likely to be sexually abused and 3.9 times more likely to be emotionally abused. In fact, findings show that 31% of students with SEND suffer abuse compared with 9% of the rest of the population. Further to this, students with SEND are also at a higher risk of experiencing multiple abuses and of enduring multiple episodes of abuse.

The College recognises that as well as threats to the welfare of students from within their families, students may be vulnerable to abuse or exploitation outside their homes and from other students. Staff will remain vigilant and alert to these potential risks.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
- Students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.
- Some students may not recognise the abuse
- Students might not be able to ask for help
- The student may rely on their abuser to meet their needs – making it even more difficult to speak out
- Parents and professionals may miss signs of abuse/neglect, mistaking them as part of a student's condition
- Professionals working with students with SEND may not be trained to spot the signs of abuse and neglect
- Students with disabilities and their families may feel isolated or without support due to a limited number of accessible services, meaning they may not know where to find help
- Abusers may try to excuse their behaviour, blaming it on the difficulties of caring for a student with SEND
- Professionals who work to support parents' ability to meet their student's additional needs may overlook parental behaviours that are not adequate

At South Bank Colleges, additional measures are in place to ensure the effective safeguarding of students with SEND. These include:

- An inclusive curriculum that is relevant and appropriate to meet the needs of all learners.
- Outstanding quality first social and emotional teaching through our tutorial programme to teach SEND students about how to keep themselves safe.
- Targeted social and emotional intervention programmes to build positive relationships with staff and peers
- Explicit teaching of all social and emotional skills through the curriculum
- Key adult methodology embedded into daily classroom practice
- Use of non-verbal methods of communication to communicate when help is needed
- Daily 'check-in' sessions for the most vulnerable students
- Working in partnership with parents building close relationships with them to offer bespoke support
- Established links with external agencies (e.g., Early Intervention, Local authority, Social Services) to enable rapid identification of changes in behaviour and presentation and enable effective early intervention.
- The college is aligned with the SEND code of practice.

5.2 Children who are lesbian, gay or bisexual – A child who is a member of the LGBTQ+ community is not immediately at risk of harm, however sometimes they can be vulnerable to discriminatory bullying. This includes a child who is perceived by others children to be lesbian, gay or bisexual, whether they are or not. The college takes any kind of bullying very seriously and this is included in the attendance and behaviour policy.

5.3 Looked after Children/ Care Leavers – Looked after and previously looked after students are very vulnerable. The college has a safeguarding officer who is responsible for monitoring and working with the LAC students in college.

The most common reason for young people becoming looked after is as a result of abuse and/or neglect. Southbank Colleges seek to minimise disruption to all students' education and positively advocates for Looked After Children.

As part of their role, DDSL & the safeguarding officer will:

- Work closely with the teachers and managers to ensure that any safeguarding concerns regarding Looked After and previously Looked After Children are quickly and effectively responded to
- Check that Looked after children are registered in college on the days on their timetable via the bespoke LAC report which is produced daily at 9.45am and shows the registration mark for all LAC learners on a given day. For any learners who have not registered for their class, a call to their carer will be made to find out why the young person is not in college.
- Ensure that appropriate staff have the information they need in relation to a young persons Looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.
- Work with virtual school heads to promote the educational achievement of looked- after and previously Looked After Children, including discussing how student funding can be best used to support Looked After Children and meet the needs identified in their personal education plan
- Ensure they have information about the young person's care arrangements and the levels of authority delegated to the carer by the local authority looking after him/her.

When the college is considering excluding, either for a fixed term period or permanently, a looked after student we will undertake an informed (multi-agency where other professionals are involved) risk-assessment prior to making the decision to exclude. A discussion will also take place with the named social worker for the young person where the exclusion will be to the home to ensure that any risk is assessed and speak to area Inclusion partnership for support if required.

5.4 Young Carers – The college recognises that students who are young carers will have responsibilities that can impact their attendance, behaviour, attainment and wellbeing. The college will strive to identify any students who are young carers so that they can be supported appropriately in college and through interactions with external agencies. The safeguarding officer who is responsible for looked after children will work with the young carers in the college.

5.5 Children who are questioning their gender – In recent years, we have seen a significant increase in the number of children who are questioning the way they feel

about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

The college will take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. The college will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

The college has a statutory duty to safeguard and promote the welfare of all children. They should consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected.

Parents and carers have the leading role in the lives of their children, and this area should be no exception. Therefore, where a child who is questioning their gender asks for support from the college, the college should engage parents/carers as a matter of priority. The college safeguarding team will support these conversations, including speaking to the parents/carers on the child's behalf.

The college provides single sex toilet facilities; however students who are questioning their gender or transitioning are able to use the single occupancy, multi gender toilets in the college.

5.6 Children with family members in prison - College staff are aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

6 Reporting Procedures – It is essential that the college has a robust reporting system embedded across all campuses. The college uses an electronic platform, CPOMs to record all safeguarding disclosures as well as low level concerns.

The Director of Student Engagement and Wellbeing and the Safeguarding and Welfare Manager produce a termly safeguarding report, including an end of year report. This is shared with the senior leadership team and the college trustees.

Staff receive an induction on using the CPOMs system as well as regular refresher training on safeguarding processes and procedures.

The process for staff to report a safeguarding concern is as follows:



There are processes in Appendix 2 which demonstrate the procedure that is followed when external agencies are involved in safeguarding a young person.

7 Sharing information – The appropriate and secure exchange of personal information, between practitioners and other individuals with a responsibility for children, in order to keep them safe from harm.

All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a [framework](#) to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

When a staff member responds to a safeguarding concern, wherever it is practicable and safe to do so, they will engage with the child and/or their carer(s), and explain who they intend to share information with, what information they will be sharing and why. The college are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

The college safeguarding team do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. There needs to be a lawful basis to share information under data protection law, but when intending to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about the decisions and the safeguarding team will seek to work cooperatively with a child and their carer(s) wherever possible. This means the safeguarding team should consider any objection the child or their carers may have to proposed information sharing, but the safeguarding team should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

The DSL/DDSL seek advice promptly whenever they are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. A child will not be left at risk of harm because concerns the safeguarding team have might be criticised for sharing information. Instead, DSL/DDSL will instead seek advice from the data protection manager in the college about what information to share and with whom. The DSL/DDSL will also follow the NSPCC's safeguarding guidance.

When sharing information, the DSL/DDSL will ensure the person or agency that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

The DSL/DDSL will only share relevant and accurate information with individuals or agencies that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – the college team will only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

The safeguarding team will record the reasons for your information sharing decision, as part of the disclosure recording on CPOMs, irrespective of whether or not you decide to share information. When another practitioner or organisation requests information from the safeguarding team, and they decide not to share it, the safeguarding team must be prepared to explain why they chose not to do so and be willing to reconsider the decision

if the requestor shares new information that might cause you to change the decision. All decisions that will be made relating to information sharing will only be made by the DSL or the DDSL.

8 Visitors and Security – South Bank colleges have a visitor's policy which is in Appendix 3 of this policy.

No visitors to the college are permitted to enter any college buildings without signing in at reception or swiping their authorized ID card. Any visitors to the college who are not employees of the college with an enhanced, current DBS certificate are able to access the college sites unsupervised. These visitors must be accompanied by a staff member at all times. This includes contractors and educational visitors, as well as official visitors such as the police.

All visitors must sign in at reception and will be issued a photo ID. Visitors must also be signed out when they leave the premises.

In order to ensure that anyone accessing the College is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided in all areas of the college, both inside and outside the college environment.

- No college services will be provided to any person not wearing their lanyard and ID pass.
- All teaching staff are required to check that their students' ID passes are worn at the start and at the end of all teaching sessions.
- Any student who has forgotten or lost their ID pass must get a temporary ID from reception. If any student records three temporary ID pass requests in any one term

this will be recorded on Promonitor for progress coaches and tutors to take appropriate action with the student.

9 Staff Training – All college staff have a responsibility for safeguarding.

All New staff, as part of their induction are issued with a copy of this policy and Part one of keeping children safe in education. New staff will also complete the college mandatory safeguarding training which serves to check their knowledge of the KCSIE part 1 as well as college policy. The pass rate for the assessment is 80%. All staff renew their mandatory training every two years.

All staff attend the college annual safeguarding training at the start of the academic year, this includes contextualised training as well as updates from the KCSIE revised versions which are issued on the 1st September every year. This training is delivered by the DSL and the DDSL.

Additional safeguarding training is given to all staff during CPD days that are organised throughout the academic year, and the training is bespoke to staff need, current trends or changes to process or procedures.

All staff complete a module of mandatory training relating to PREVENT, new starters will complete this as part of their induction and all staff complete the module every two years. Staff also attend the prevent training provided by the local PREVENT team.

All Governors and Trustees complete mandatory safeguarding and PREVENT training as part of their induction to their post and are required to read the safeguarding policy and the KCSIE document in full. Governors/Trustees are also required to complete the annual safeguarding training delivered by the DSL and the DDSL.

All staff safeguarding training is recorded on the college Single Central Record (SCR). The SCR contains a list of all current staff, including agency staff and records the DBS status of staff, ensures that safer recruitment has taken place and holds a record of staff training. The SCR is checked regularly by the DSL to ensure compliance.

All members of the college safeguarding team are DSL Level 3 qualified and the DSL and DDSL are qualified teachers with relevant experience and DSL Qualifications. These qualifications are renewed every two years.

10 Allegations against staff - All members of the college community should feel able to raise concerns relating to unsafe practice and potential failures with regards to safeguarding, as well as other general concerns.

If you have a concern about a member of staff, including agency staff or visitors, you should contact the DSL as soon as possible. If the concern is relating to the DSL then you should contact the college Principal.

The DSL will record what the concern is and will investigate the allegation thoroughly. The DSL will contact the Local Authority Designated Officer (LADO) for This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or young person's social care services. (The DSL may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to young people or vulnerable adults or there is evidence of a possible criminal offence. In such cases, the DSL will notify the LADO as soon as practicably possible after contacting the police).

Dependent on the nature of the allegation, a decision to suspend pending further investigation may apply as set out in the College Disciplinary procedure. In this instance a member of the senior leadership team and a HR representative will meet with the accused to inform them of this decision and make arrangements to immediately escort them off of the College premises as soon as possible after speaking to the LADO (and the police or social care services, where necessary). Where the police and/or social care services are involved, the DSL will only share such information with the individual as has been agreed with those agencies. If immediate suspension is considered necessary, agree and record the rationale for this with the Head of Human Resources. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details.

Following a formal investigation, a report will be written - if it is decided that no further action is to be taken about the subject of the allegation or concern, the member of staff will be notified in writing by the DSL and any recommendations will be followed up. It would also be appropriate to update all parties involved with the outcome of the formal investigation and/or any subsequent recommendations.

If it is decided that further action is needed, a report detailing the findings concluding the recommendation for a disciplinary hearing will be submitted by the case manager. The

appropriate steps will be taken in line with section 8 of the Disciplinary Procedure will be adhered to.

The college will provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

The DSL or DDSL will inform the parents or carers of the young person/persons involved about the allegation as soon as possible if they do not already know (following agreement with social care services and/or the police, if applicable). The DSL will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice. The college will keep the parents or carers of the young person/persons involved informed of progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

The DSL will make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person.

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full-time education and the person works in the same establishment as the young person, even if he/she does not teach the young person. It is college policy that there should be no sexual relationship formed between a staff member and a student aged 18 or over during the course of the students time at the college, however, if a staff member is in a relationship with a student over the age of 18, that started prior to the student attending the college, it is required that the staff member discloses this to HR immediately should this be the case.

11 Recruitment and Selection – The college has a safer recruitment policy and procedures. This is attached in appendix 4. The safer recruitment policy and process is in place to ensure that the members of the college staff team are suitable to work with children.

The college undertakes appropriate recruitment and vetting checks on applicants who are being considered for employment at the college. The process ensures compliance in keeping children safe and follows guidance issued by the department of education, Ofsted and the UK employment law.

The College's recruitment and selection procedures include the following requirements:

- The post should be clearly defined and the key selection criteria for the post should be identified.
- Vacancies should be advertised widely, as appropriate, in order to ensure a diversity of applicants.
- Applicants are required to complete an application form and sign to declare the information they have provided is to be true.
- The chair of the interview panel will ask questions in respect of areas of concern and ensure the right people are selected for employment.
- Evidence of qualifications and Identity is obtained, including the eligibility of the candidate to work in the UK.
- Employment/educational references are required for successful candidates.

- The successful candidate's application form is reviewed by Human Resources and any gaps in employment or other missing information is followed up.
- Enhanced Disclosure and Barring Service (DBS) disclosures are undertaken for all employees, which are treated sensitively and confidentially.
- Where a DBS disclosure have not been received before a candidate is due to start employment then a risk assessment will be undertaken and assessed to ensure that it is appropriate for the candidate to start work.
- The risk assessment can only be assessed and signed off by the DSL and Group Director of People.
- It is important to be sure that the person is who they claim to be and to verify their identify, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
- Highlighting as part of the shortlisting process that the college, specifically HR, will carry out an online search as part of our due diligence of the shortlisted candidates. This can then be explored with the candidate at the interview. The college will inform the shortlisted candidates that online searches may be undertaken.

Separate barred list checks must only be carried out in the following circumstances:

- For newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
- Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks have been carried out).

Partners and Subcontractors

South Bank Colleges is committed to ensuring that all learners, regardless of where or by whom their learning is delivered, are safeguarded and protected from harm. Any partner organisation or subcontractor delivering provision on behalf of the College is required to comply with the College's safeguarding, child protection, Prevent and safer recruitment requirements, together with all relevant statutory guidance and funding body requirements.

Partners and subcontractors must:

- Maintain effective safeguarding and child protection policies and procedures that are reviewed regularly and compliant with current legislation.
- Maintain an up-to-date Prevent Risk Assessment and evidence of compliance with Prevent Duty requirements.
- Ensure all relevant staff have received appropriate safeguarding and Prevent training and understand their responsibilities for keeping learners safe.
- Undertake appropriate pre-employment checks, including DBS checks where required, and maintain a Single Central Record or equivalent evidence of safer recruitment checks.
- Appoint a designated safeguarding lead (DSL) and provide the College with details of safeguarding contacts and escalation arrangements.
- Report safeguarding concerns, allegations, incidents, Prevent referrals or learner welfare concerns to the College in line with agreed reporting procedures and within required timescales.
- Cooperate fully with safeguarding audits, monitoring visits, quality assurance reviews and any investigations undertaken by the College or external

agencies.

- Ensure learners are made aware of safeguarding support available to them and understand how to report concerns.
- Comply with College requirements relating to equality, diversity, inclusion, online safety, data protection and learner welfare.
- Notify the College immediately of any significant safeguarding incident, regulatory investigation, serious complaint or event which may affect learner safety, welfare or the reputation of the College.

The College retains overall accountability for safeguarding learners studying on subcontracted or partner-delivered provision. Compliance with safeguarding expectations will be monitored through due diligence reviews, annual onboarding, quality assurance activity, contract management meetings, safeguarding audits, monitoring visits and ongoing contract review processes. Failure to comply with safeguarding requirements may result in formal intervention, suspension of delivery or termination of contractual arrangements.

12 Policy Review – The college safeguarding policy is reviewed annually in accordance with the Keeping Children Safe in Education (KCSiE) updates.

The policy will always be reviewed as a result of government guidance, college experience and best practice.

The policy is updated by the DSL and reviewed and agreed by the Senior Leadership Board and the Quality Improvement board.

13 Complaints – Any complaints relating to the management of safeguarding in the college should be sent to the DSL. If the complaint is about the DSL then it will be managed through the college complaints procedure.

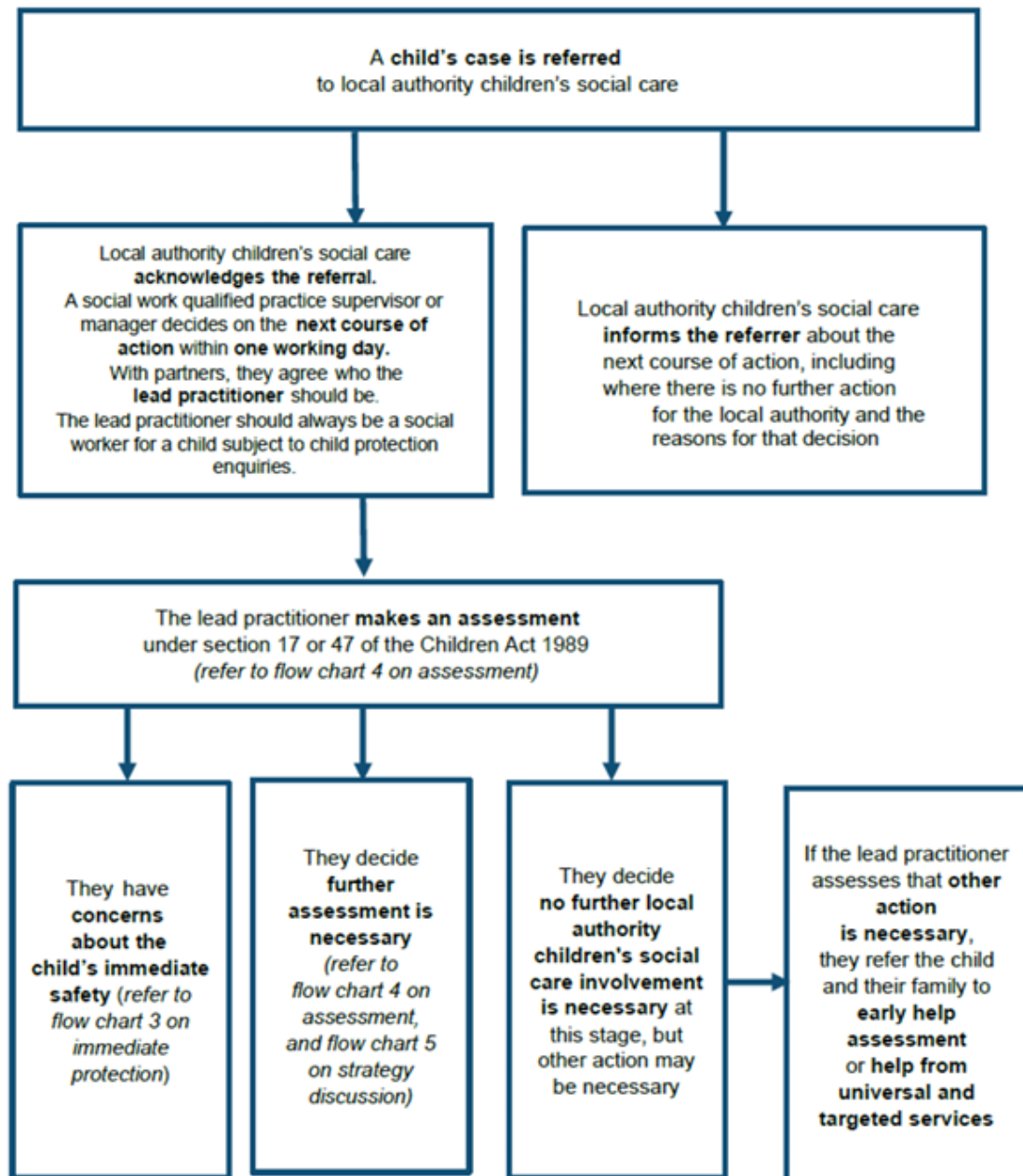
Appendix 1 – Guidance on appropriate boundaries

The following situations are never appropriate while working with students:

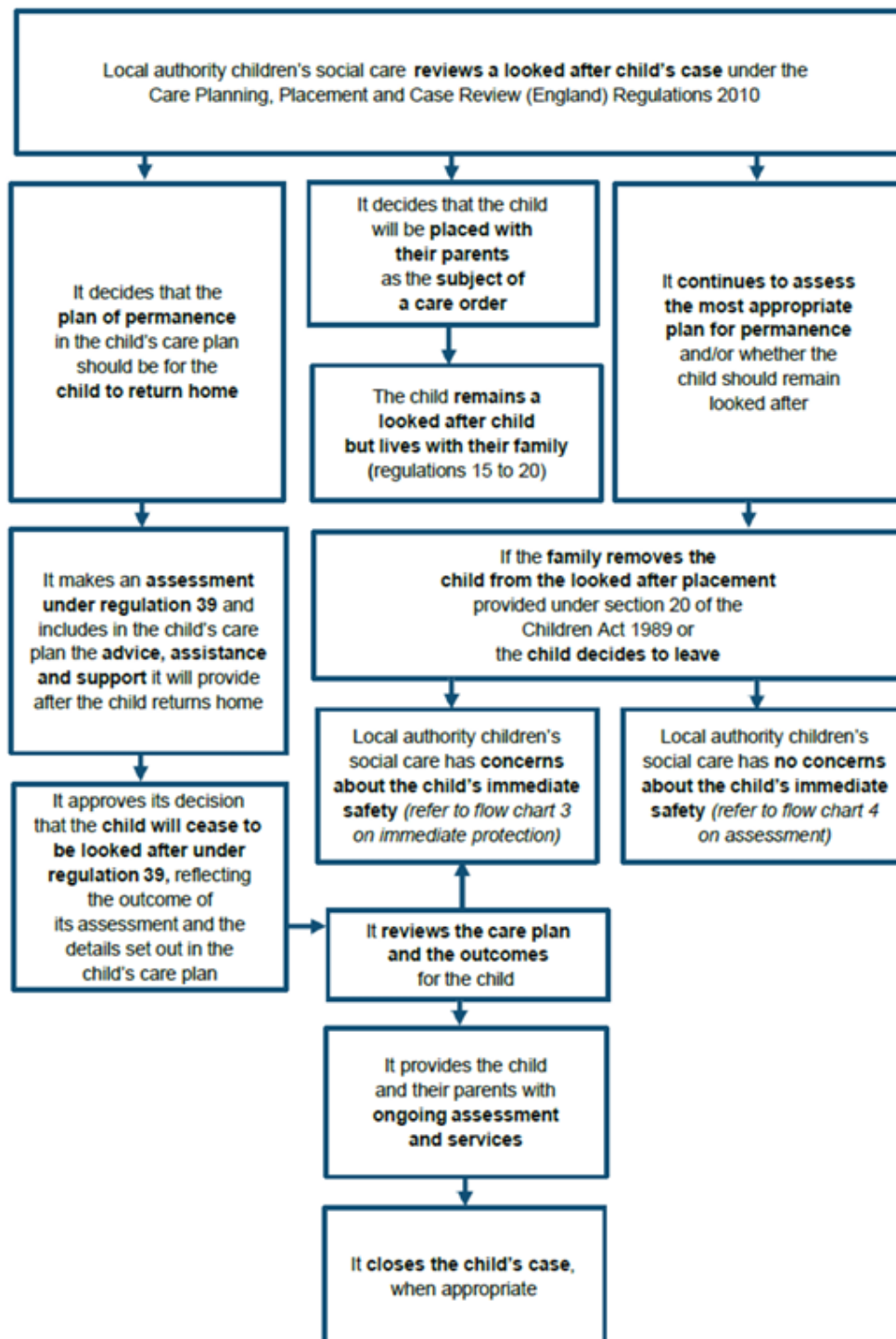
- Drinking Alcohol
- Following, sharing or interacting with a student or apprentice via own personal social media e.g., WhatsApp, Facebook, Snapchat, Instagram or Twitter (X) •
- Any illegal activity with a student •
- Having any form of sexual relationship with a student •
- Accepting money or gifts from a student •
- Lending money to students •
- Giving a student a lift home •
- Telling a student your home address, home telephone number, or mobile number
- Taking a student to your home/ Going to a student's home
- Promising to keep any information they disclose confidential
- Arranging to meet a student outside of work hours or on non-college business
- Physical contact should be avoided unless for the purpose of professional assistance such as with a student's self-care
- Talking about a student/member of staff in a public space where the conversation can be overheard
- Talking about a student's private business in front of other students
- Discussing a student with another member of staff other than your line manager or other staff who have direct responsibility for that student, without their consent
- Giving out any information over the telephone about students, without their consent
- Sending e-mails or other communication containing a student's name without their consent
- Using a personal email, phone or social media site to communicate with students
- Storing data on students in an unlocked drawer/cabinet/filing system
- Disposing of student data in an unsecured manner
- Taking responsibility for a student's personal property

Appendix 2 – Process Flow Charts

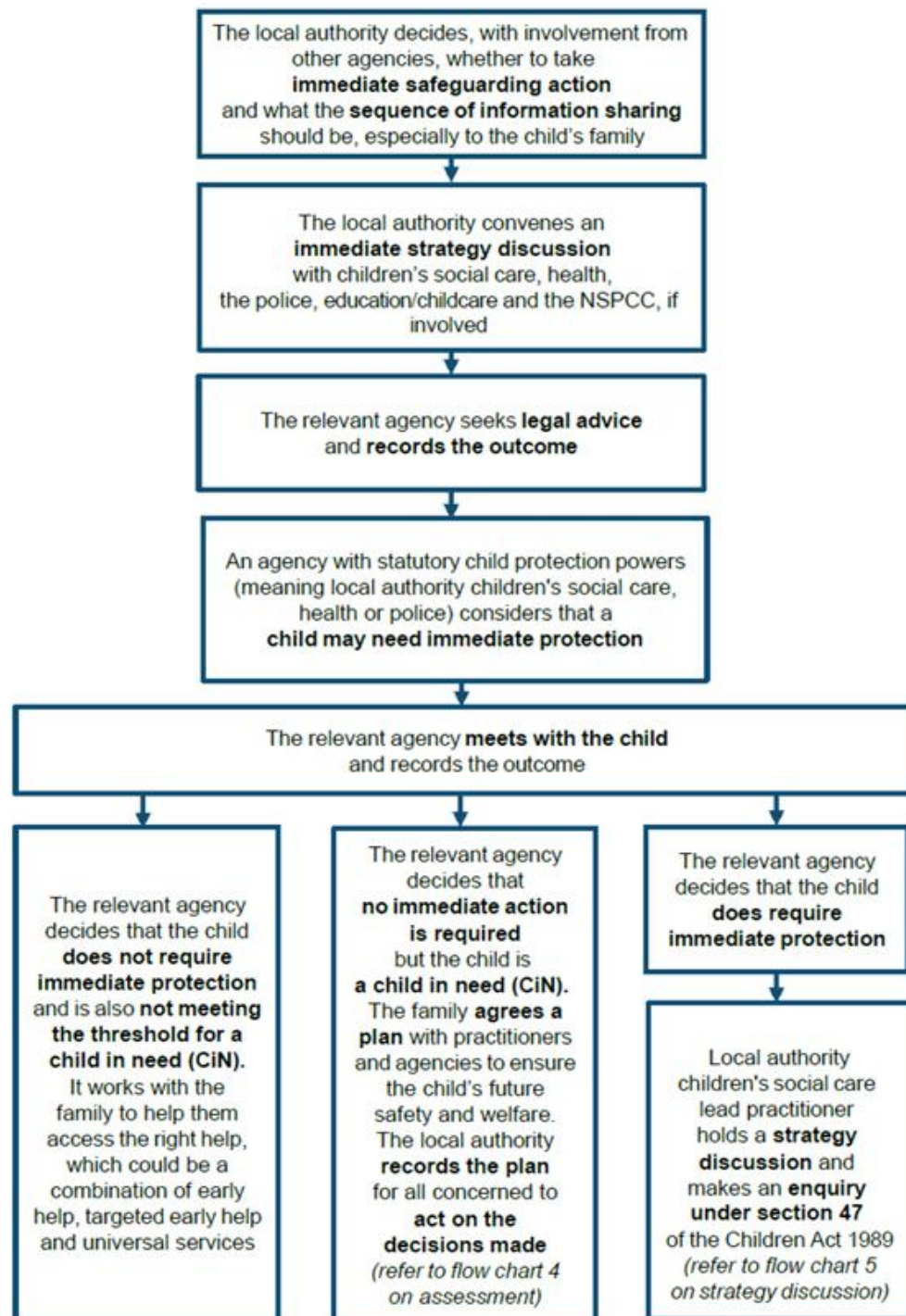
Flow chart 1: Action taken when a child is referred to local authority children's social care



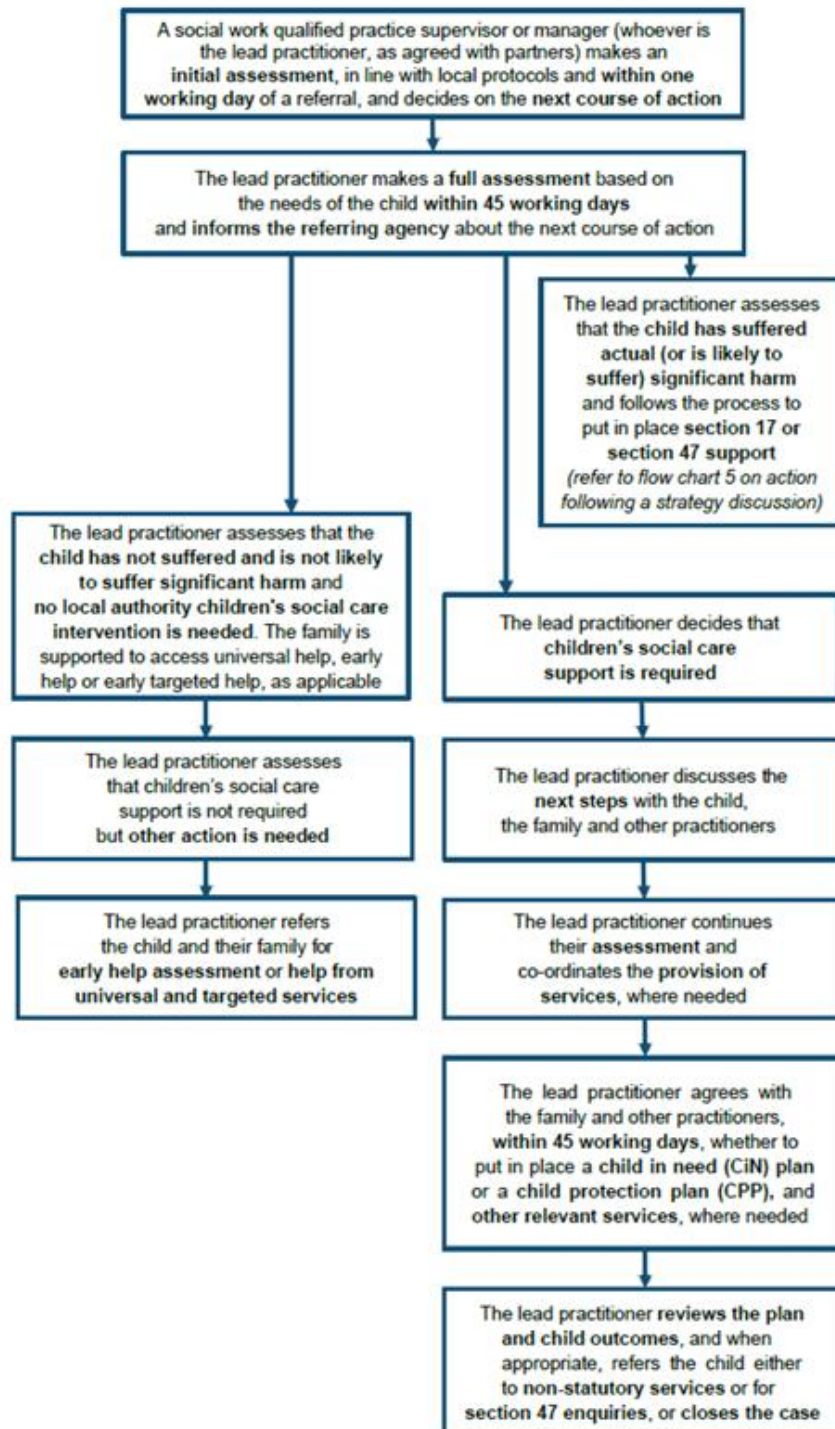
Flow chart 2: Looked after children returning home to their families



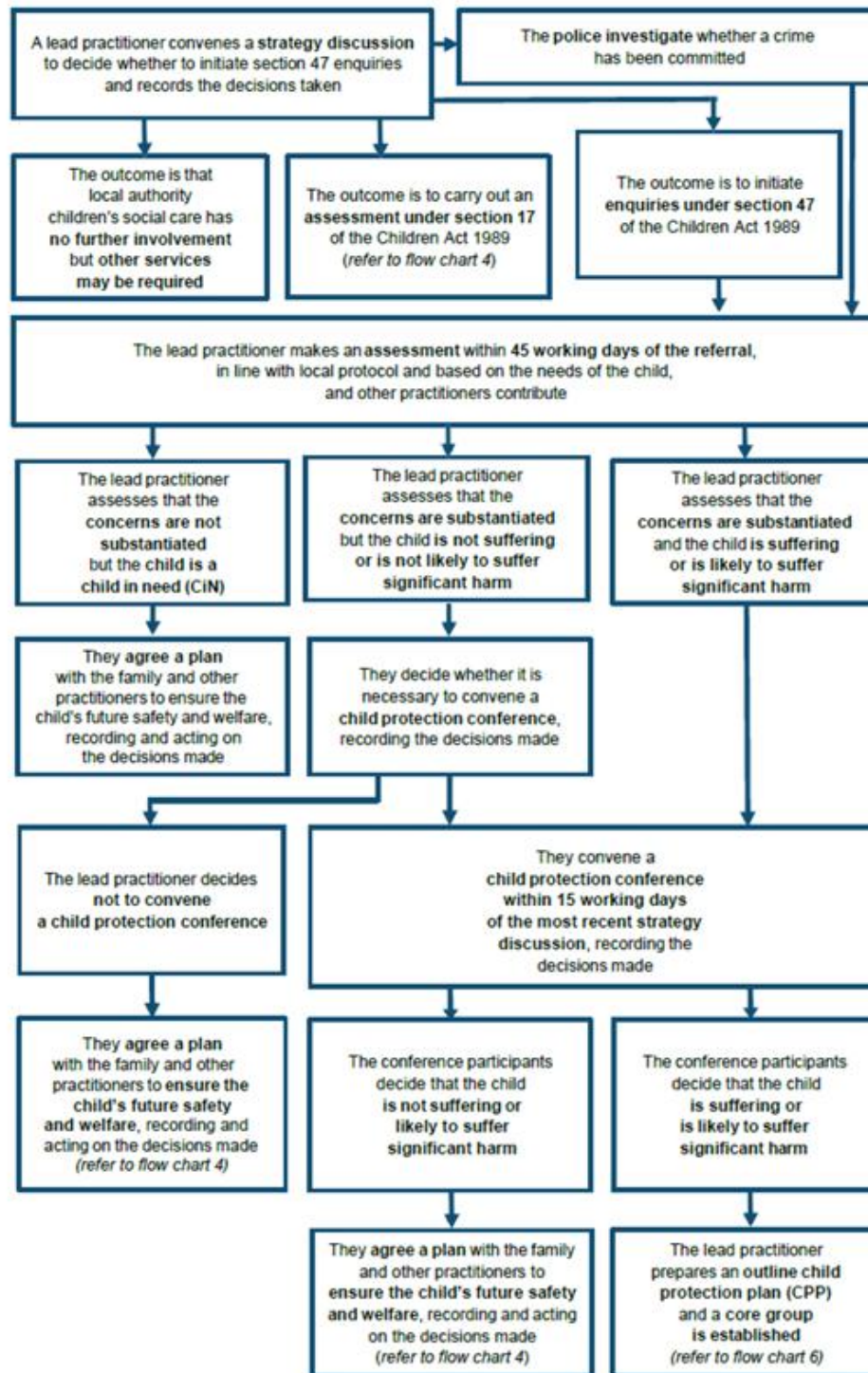
Flow chart 3: Immediate protection



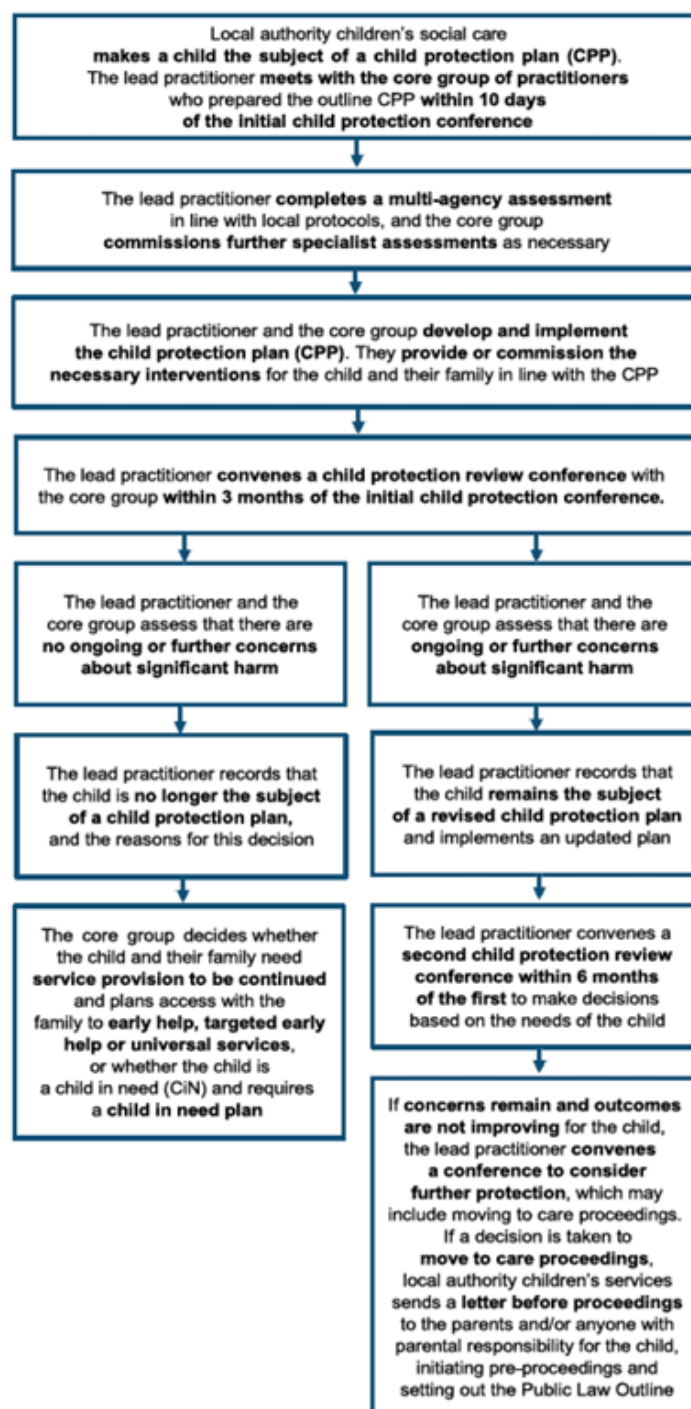
Flow chart 4: Action taken for an assessment of a child under the Children Act 1989



Flow chart 5: Action following a strategy meeting



Flow chart 6: What happens after the child protection conference, including review?



Appendix 3 – South Bank Colleges Visitors Policy

1. Introduction

The College has a duty of care for the health, safety, security and wellbeing for all on its premises, which includes the duty to safeguard all our students from harm. In performing this duty, this policy sets out the College's protocols for the admittance of Visitors to the College. Whilst maintaining the security of the college and the safeguarding of our students, it is important also that we retain a friendly, relaxed, welcoming atmosphere in college. Staff and students are required to treat all visitors with dignity and respect, and visitors are expected to return the compliment.

When we refer to College within this policy we are referring to those colleges and campuses that are collectively known as South Bank Colleges. This includes Lambeth College – Clapham, Lambeth College – Brixton and London South Bank Technical College – Nine Elms

2. Visitors to the College

For the purposes of this Visitor's Policy a visitor is someone who is visiting the College who is neither directly employed by the College nor a student that is currently enrolled at the college.

- a. A Visitor could be, but is not limited to being, a member of the public, a parent, guest speaker, trainer, contractor, auditor, an applicant attending an interview or an individual attending the College for a meeting.
- b. Protocols in relation to Governors, volunteers, agency workers, contracted out services (Mitie and Chartwells Catering) self-employed contractors, regular contractors who are onsite for 4 or more days in a month, and trainees (work experience) attending the College are covered in the Safer Recruitment Procedure. Appointment to these roles must always be notified in advance to HR so that the appropriate checks can be completed in line with the Safer Recruitment Policy before the start date at college.

3. This policy should be read alongside the following policies:

- Safeguarding Policy
- Safer Recruitment Policy
- Equality and Diversity Policy

Procedure for College Visitors

4. Visitors can be categorised as follows:

- a. Non-regulated visitors such as members of the public, individuals coming into college for a meeting including parents, individuals delivering staff training, auditors, guest speakers and organisations.
- b. Regulated visitors such as governors/trustees, LSBU staff who appear on the college SCR, onsite contractors, agency workers and volunteers who have all been cleared by an enhanced DBS check.
- c. Official visitors (e.g. Police Officers, Health Care Professionals, NHS Workers, CAMHS, Social Services)
- d. Regular and Ad hoc Contractors (e.g. building Maintenance, Systems Engineers)
- e. Visitors providing information and/or promotional services (e.g. health promotion stalls/universities providing careers information, companies promoting their products)

- 4.1. When any Visitor is expected to the College, the member of staff who has organised the visit (the organiser) must in advance advise reception of the visitor including;
 - Full Name
 - Date
 - Time
 - Organisation the visitor is from
 - Who the visitor is coming to see
- 4.2. All visitors will be asked to sign in and out at reception using the college's electronic sign in system. The system will send an automatic email to the organiser of the visitor with a copy of the photo captured in reception.
- 4.3. Visitors will be given a yellow visitor's badge with a photo ID to wear at all times when on site.
- 4.4. When a Visitor has signed in they will be asked to wait in the seating area and the organiser will come and collect the visitor.
- 4.5. Visitors wearing a yellow lanyard and must be supervised at all times. Staff are encouraged to approach any individuals they see in a yellow lanyard who appears to be unsupervised, to check who they are visiting –to ensure they are fully supervised.
- 4.6. Visitors who have been confirmed as being fit to work with young people in regulated activity will be issued with temporary staff lanyards and will be able to move around the college unsupervised.
- 4.7. All visitors will be given a copy of the Safeguarding and Safety Information Leaflet
- 4.8. On leaving, the organiser will accompany their visitor to reception to sign out and return their visitor/temporary staff badge and lanyard.

5. Non-regulated visitors

- 5.1. A non-regulated visitor must always be supervised and will not have access to any college systems. Supervision is still required during student holiday periods.
- 5.2. Non-regulated visitors will sign in and out at reception and be issued with a visitor's photo ID with a yellow lanyard.

6. Official visitors

- 6.1. Official Visitors are individuals who work for an official and approved organisation that may require unsupervised access to students as part of their professional role. Examples of this include, medical professionals, the police, or CAMHS.
- 6.2. The Safeguarding and Wellbeing Team and Learning Support Teams will seek and receive a blanket confirmation from the approved organisation that any individual sent to the College has an enhanced DBS Disclosure including Barred List Check, they have completed all necessary checks to confirm that they are suitable to work in regulated activity with children and their staff are provided with regular safeguarding training.
- 6.3. Official Visitors will be required to sign in at Reception to have their identification verified (their ID must verify that they are an employee of the Approved Organisation).
- 6.4. Once escorted by the organiser to the designated location, Official Visitors will be able to meet with named students without the need for supervision. Once they have completed their role, they will be escorted out of the college, signing out at reception.

7. Regular and ad hoc contractors

- 7.1. For regular named contractors or irregular contractors from an approved organisation, the organiser should follow the protocols outlined in our Safer

Recruitment Policy. The staff responsible for the contract should work with the HR department in completing the Procurement Checklist held within the policy.

- 7.2. Regular named contractors or irregular contractors from an approved organisation will be issued with a temporary staff college ID.
- 7.3. Visiting irregular contractors who are not from an approved organisation will be subject to the same protocols as a non-regulated visitor in section 3 of this policy. They must be actively supervised by the organiser or designated member of staff for the duration of their visit.
The level of supervision required will be assessed as appropriate by the organiser but must include:
 - The organiser escorting the visitor to the job location and an estimate of how long the job is likely to take
 - Accompanying the visitor to the restroom, canteen or other communal areas
 - Escorting the visitor off site at the end of the visit
- 7.4. Visiting irregular contractors who are not from an approved organisation will be issued with a visitor's photo ID with a grey lanyard.

8. Visitors providing information and/or promotional services

- 8.1. A Visitor providing information and/or promotional services would be an individual from an organisation that has been invited to the College to provide students and/or staff with information and/or promote a product or service.
- 8.2. The organiser must get authorisation for the visit in line with the guidance below.
- 8.3. Any visitor providing information and/or promotional services will be considered a non-regulated visitor and will require full supervision throughout the duration of their visit to the College. They will sign in and out at reception and be issued with a visitor's photo ID with a yellow lanyard.
- 8.4. A visitor providing information and/or promotional services will normally be set up with a stall or table in a high circulation area (The Street, Careers) arranged by the organiser.

9. Visiting Speakers, organisations and events

- 9.1. The college recognises the value of guest speakers and/or organisations and events is committed to putting in place measures to ensure that the messages communicated support the College's Values and commitment to equity, diversity and belonging, and compliance with the Prevent Duty.
- 9.2. Prior to confirming the guest speaker, the organiser must complete an External Speaker Risk Assessment (ESRA) form and submit it for authorisation to the safeguarding manager. As part of this process the organiser must consider any information available about the guest speaker and/or organisation, the content of the proposed presentation, the potential audience, the education benefit and the risk associated with the visit.
- 9.3. The organiser should ensure the following:
 - The presentation must be appropriate to the age and maturity level of the student audience.
 - Appropriate dress, language, and behaviour are required at all times
 - The presentation must not incite hatred, violence or call for the breaking of the law
 - The Visiting Speaker is not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts
 - The Visiting Speaker must not spread hatred and intolerance of any minority group/s in the community and thus aid in disrupting social and community harmony

- The content of the speech/presentation must contribute to preparing students for life in Modern Britain
- The Visiting Speaker must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge
- Visiting Speakers are not permitted to raise or gather funds for any external organisation or cause without express permission from the principal
- There should be compliance with the College Equality, Prevent and Safeguarding Policies

9.4. The following procedures should apply:

- All visiting speakers to have a nominated point of contact at the College (the organiser)
- The organiser must conduct research on the person/organisation to establish whether they have demonstrated extreme views/actions – a biographical internet search will usually be suitable. Once done this should be indicated on the ESRA form
- The organiser must inform the Visiting Speaker that USB sticks must not be brought into college and that any presentation/material etc **must** be sent to the host in advance. To prevent both IT corruption and for the organiser to review the suitability of the resources.
- Staff must refuse to allow people/organisations to use College premises if they have links to extreme groups or movements. Justification of the College's decision will be provided to the person/organisation in writing
- Any information gathered will be kept in accordance with the College's Data Protection Policy.
- Visitors must provide photo ID upon arrival at the college reception
- Visiting speakers are to be accompanied at all times and are not to be left unsupervised with students at any point
- In the unlikely event that the talk/presentation does not meet with the requirements of the Guidelines for Visiting Speakers, organisers and other College staff have the right and responsibility to interrupt and/or stop a presentation
- The organiser will conduct a post-event evaluation of how the visit met the needs of our staff and students

10. Use of college premises for non-college activities

- 10.1 For services or activities provided separately by another organisation the Commercial Services and Events Manager will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); Arrangements will be put in place for the provider to liaise with the college on these matters where appropriate. This applies regardless of whether the children who attend any of these services or activities are children on the attend the college. The Commercial Services and Events Manager will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 10.2 To ensure that organisations using the premises for non-college activities are following the above procedures all hire/lettings will go through a central booking system that manage the collection of safeguarding information on behalf of the college. The booking system is currently 'School Hire' and organisations wishing to book the premises will be directed to their website to secure facilities.

11.1.1. All visitors will be asked to confirm their understanding of the following college requirements when signing in:

- EDI - SBC offers an environment where students feel welcome, safe, stimulated and where students are free to enjoy learning and developing in confidence.
- Safeguarding - If you have any safeguarding concerns whilst visiting our site please contact one of the safeguarding team immediately – this can be done via the college reception or via email safeguarding@southbankcolleges.ac.uk
- Emergency Procedures - The emergency alarm is the continuous ringing of a high-pitched tone. In the event of an alarm activation please leave the premises immediately via the nearest safe exit and report to the designated assembly point.
Should you require assistance to evacuate the building please inform reception on arrival. Please do not re-enter the building until you are instructed to do so.
- Accidents/Incidents - All accidents, injuries and near misses must be immediately reported to reception in person. Reception are also able to call a first aider if needed. (All accidents or near misses are recorded on the college OSHENs system).

College Lanyards

SBC Lanyard & Badges Proposal 3 - 20mm wide





SOUTH BANK COLLEGES ADULT STUDENT 19+

 SB \ SOUTH BANK COLLEGES **STUDENT** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **STUDENT** SB \ LAMBETH COLLEGE

SOUTH BANK COLLEGES ADULT STUDENT 19+

 SB \ SOUTH BANK COLLEGES **STUDENT** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **STUDENT** SB \ LAMBETH COLLEGE

APPRENTICE

 SB \ SOUTH BANK COLLEGES **APPRENTICE** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **APPRENTICE** SB \ LAMBETH COLLEGE

SOUTH BANK COLLEGES STAFF

 SB \ SOUTH BANK COLLEGES **STAFF** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **STAFF** SB \ LAMBETH COLLEGE

Retractable Reel
 LSRCT STUDENT (16-18 year olds)

 SB \ SOUTH BANK COLLEGES **STUDENT** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **STUDENT** SB \ LAMBETH COLLEGE

LAMBETH COLLEGE STUDENT (16-18 year olds)

 SB \ SOUTH BANK COLLEGES **STUDENT** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **STUDENT** SB \ LAMBETH COLLEGE

LAMBETH COLLEGE CONTRACTOR

 SB \ SOUTH BANK COLLEGES **CONTRACTOR** SB \ LONDON SOUTH BANK TECHNICAL COLLEGE **CONTRACTOR** SB \ LAMBETH COLLEGE

VISITORS

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Appendix 4 – Safer recruitment policy

South Bank Colleges Safer Recruitment Policy

1. Policy Statement

South Bank Colleges (“the Colleges”) is committed to safeguarding and promoting the welfare of children, young people and adults at risk. We recognise our statutory responsibilities under:

- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education (KCSiE) 2025
- Prevent Duty Guidance 2021
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Education Act 2002

This policy outlines how the Colleges ensure safe recruitment and ongoing safe working practices across our sites, fully aligned with our overarching Safeguarding Policy and Procedures.

2. Purpose and Alignment with Working Together to Safeguard Children (WT 2023)

The purpose of this policy is to ensure that South Bank Colleges recruits only individuals who are safe, suitable and appropriately vetted to work with children, young people and adults at risk. In line with *Working Together to Safeguard Children 2023*, which sets national expectations for safer recruitment, vetting and safeguarding practice, the Colleges embed safeguarding, Prevent Duty and equality considerations into every stage of the recruitment process. Recruitment decisions are grounded in a child and young person-centred approach that recognises the complex safeguarding needs of Further Education learners and the influence that family and contextual factors may have on their wellbeing.

This policy ensures that all staff, volunteers, contractors and visitors are appropriately assessed for their suitability, supervised proportionately and supported to uphold the Colleges’ safeguarding standards. Consistent with WT 2023’s national multi-agency child protection standards, the recruitment process seeks individuals who can demonstrate professional curiosity, respond promptly to concerns, and work effectively with safeguarding partners, including when identifying early help needs and securing statutory interventions where required.

3. Scope

This policy applies to all:

- employees
- governors
- contractors
- agency/supply staff
- volunteers
- placement students
- visiting professionals
- external organisations using the Colleges’ premises

4. Recruitment Principles

South Bank Colleges commits to:

- deterring unsuitable applicants

- thorough pre-employment vetting
- structured interviews with safeguarding focused questions
- Equality driven and inclusive selection practices
- transparent and accountable decision-making
- clear communication of safeguarding expectations to all prospective staff

5. Roles and Responsibilities

5.1 Hiring Managers

Hiring managers play a central role in maintaining safe recruitment practices and must ensure that every stage of the selection process reflects the Colleges' safeguarding expectations. They are required to complete Safer Recruitment training every two years and to apply all elements of this policy consistently.

As part of the shortlisting and interview process, they must scrutinise applications carefully for gaps or inconsistencies and ensure that safeguarding focused questions are built into interviews. Hiring managers also contribute to ongoing quality assurance by participating in safer recruitment audits and evaluations.

Key responsibilities include:

- completing Safer Recruitment training every two years
- scrutinising applications and embedding safeguarding in interviews
- participating in safer recruitment audits

5.2 HR Department

The HR Department is responsible for coordinating the operational aspects of safer recruitment and ensuring that all vetting checks are carried out in accordance with statutory and organisational requirements. This includes maintaining the Single Central Record (SCR), processing Disclosure and Barring Service (DBS) and barred list checks accurately, verifying identity, qualifications and right to work, and conducting online searches where appropriate.

HR also ensures that recruitment files are complete, compliant and ready for internal or external audit.

HR core duties include:

- maintaining the SCR and completing all vetting checks
- verifying identity, qualifications and right to work
- coordinating online searches and ensuring compliant recruitment files

5.3 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead oversees the safeguarding integrity of the recruitment process. The DSL ensures that recruitment decisions align with identified safeguarding risks and provides guidance on any positive disclosures or complex vetting outcomes.

They act as the liaison with the Local Authority Designated Officer (LADO) when concerns arise during recruitment and review emerging themes to inform staff training and improvements to safeguarding practice.

The DSL's role includes:

- ensuring recruitment aligns with safeguarding risk considerations
- making decisions on positive disclosures and liaising with the LADO
- reviewing recruitment related safeguarding themes to guide training and risk reduction

6. Safer Recruitment Stages

6.1 Pre-Recruitment Planning

Before any role is advertised, job descriptions and adverts must clearly set out the safeguarding responsibilities associated with the post and describe South Bank Colleges as a child and young person centred, trauma informed environment.

They should also make explicit our commitments to the Prevent Duty, equality and anti-discriminatory practice, and confirm that online checks will form part of the recruitment process. These elements help ensure that applicants understand from the outset the safeguarding expectations and values embedded in all roles across the Colleges.

Person specifications must be designed to assess applicants' safeguarding awareness, their motivation to work with young people and their understanding of the specific vulnerabilities present within an FE environment, including the needs of SEND and Looked After Children and the influence of contextual safeguarding risks.

They should also enable evaluation of each candidate's ability to work effectively with external agencies, reflecting the multiagency partnership working that is central to our safeguarding approach.

6.2 Applications

Applicants are required to complete the Colleges' standard application form and provide a full and accurate employment history, including clear explanations for any gaps. They must declare any unspent or relevant spent convictions in line with our Policy Statement on the Recruitment of ex-Offenders', disclose previous safeguarding or conduct concerns and confirm their fitness to work in an education setting.

CVs alone are not accepted, as they do not provide the necessary safeguarding focused information required for safer recruitment.

Applicants must:

- complete the official application form
- provide full employment history with explanations for gaps
- make all required safeguarding and conduct disclosures

6.3 Shortlisting

Shortlisting panels are expected to review applications with a strong safeguarding focus, examining employment history, exploring any concerns and assessing candidates' understanding of Prevent Duty, inclusion, SEND, LAC needs and trauma informed practice. Panels must conduct online searches in line with statutory guidance and document their decisions clearly to ensure transparency, fairness and full accountability.

Shortlisting panels must:

- analyse applications through a safeguarding lens
- review attitudes toward Prevent, inclusion, SEND and LAC
- conduct required online searches and record decisions

6.4 Interviews

All interview panels must include at least one member trained in Safer Recruitment and explore a candidate's safeguarding awareness, Prevent Duty understanding and professional conduct expectations.

Interviews must assess motivation to work with young people, ability to recognise and escalate concerns, understanding of SEND, LAC and contextual safeguarding, and confidence in challenging unsafe behaviour. Candidates must also demonstrate appropriate knowledge of information sharing, online safety and lowlevel concerns procedures.

Interviews will assess:

- safeguarding and Prevent awareness
- motivation, judgement and ability to challenge concerns
- understanding of SEND, LAC and contextual safeguarding
- ability to identify, escalate and share concerns appropriately

6.5 Pre-Employment Vetting Checks

Before starting, all successful candidates must complete:

- Identity Checks (verified with original documents and check for name changes / aliases)
- Right to Work
- Enhanced DBS and Barred list Check
- Two verified References, obtained from professional emails and including the most recent employer
- Overseas Criminal Records Checks
- Qualification Checks
- Online Search Checks
- Prevent Duty Suitability Checks

6.6 Conditional Offers

All offers of employment at South Bank Colleges remain strictly conditional until every required vetting check has been completed to a satisfactory standard. Successful candidates must also agree to comply fully with the Colleges' safeguarding, conduct, whistleblowing, online safety, Prevent and equality policies as part of their contractual obligations.

In addition, all appointments are subject to a successful probationary period, during which the individual's suitability, professional conduct and adherence to safeguarding expectations will continue to be assessed.

7. Volunteers, Contractors, Agency Staff, Visitors and Third-Party Premises Users

7.1 Volunteers

All volunteers must undergo an appropriate risk assessment before starting their role, with DBS requirements determined by whether their activity meets the definition of regulated activity. They must also receive a full safeguarding induction, including Prevent Duty expectations and the Colleges' reporting procedures.

7.2 Supply/Agency Staff

Agencies supplying staff to the Colleges must confirm full compliance with safer recruitment

requirements and provide all Single Central Record information in advance. The Colleges reserve the right to audit this documentation to ensure accuracy and safeguarding integrity.

7.3 Contractors

Contractors working on site are required to share their safeguarding and Prevent policies with the Colleges and must wear visible identification at all times. Where contractors do not have clearance for unsupervised access, they will be supervised to ensure learner safety.

7.4 Visitors and Third Party Premises Users

Any Visitors using the Colleges' premises must sign in and out at reception on each visit and must be collected from and returned to reception by their host or authorised assistant. They must not be allowed to move through the Colleges' premises without escort. The host is responsible for ensuring adherence to these requirements.

Any external organisation using the Colleges' premises must demonstrate that they have robust safeguarding and Prevent arrangements in place, and adherence to these requirements remains a condition of hire.

7.5 LSBU Group staff

Some authorised LSBU Group staff may have access to the premises of the college. In such cases the host employer must confirm full compliance with safer recruitment requirements and provide all Single Central Register information in advance. LSBU Group staff without such authorisation and clearance must be treated in line with the visitors' provision in 7.1 above.

8. Induction

All new staff must receive training covering:

- safeguarding and child-protection procedures
- Prevent Duty and local risks
- online safety (including filtering and monitoring)
- SEND and LAC safeguarding
- equality, diversity and inclusion
- professional boundaries and conduct
- reporting low-level concerns
- site-security requirements (ID passes, access control)

Induction is mandatory before unsupervised access to learners is given.

9. Ongoing Safeguarding Culture

South Bank Colleges maintains a strong safeguarding culture in which staff are expected to demonstrate professional curiosity, noticing early signs of harm, interpreting low level or contextual indicators and escalating concerns without delay. Recruitment therefore seeks individuals who understand early help processes, multiagency thresholds and the importance of acting promptly and responsibly.

All staff must also uphold the Colleges' zero tolerance approach to discrimination, bullying, sexual harassment, extremist views, unsafe conduct and any breaches of professional boundaries, ensuring that safeguarding remains a shared and consistent priority across the organisation.

10. Allegations Management

All staff are made aware of the allegations procedures described in the Safeguarding Policy.

Key principles:

- concerns about staff must be reported immediately to HR and the DSL
- cases are referred to the Local Authority Designated Officer (LADO)
- staff may be suspended as a safeguarding measure
- records will be maintained securely and separately
- referrals to the Disclosure and Barring Service (DBS) will be made when required

11. Confidentiality & Information Sharing

Recruitment requires staff who understand how UK GDPR applies to safeguarding and who recognise that, in certain circumstances, information may be shared without consent when a child is at risk. They must be able to apply the “serious harm test” appropriately and follow the Colleges’ established information sharing protocols to ensure that confidentiality is balanced with the need to protect children effectively.

12. Single Central Record (SCR)

The SCR will include, for all staff and relevant personnel:

- identity checks
- barred list and DBS checks
- right to work
- qualifications
- overseas checks if applicable
- references
- safer recruitment training dates

13. Monitoring & Review

This policy is reviewed annually by HR, DSL and CEB. It will also be approved by Trustees and evaluated using safeguarding data, recruitment trends and audit findings.

Reviewed: March 2026

Next Review: March 2027

Appendix 5

Glossary of Acronyms used in the policy and procedures.

CCE	Child Criminal Exploitation
CPOMS	Child Protection Online Management System
CSE	Child Sexual Exploitation
DBS	Disclosure & Barring Service
DSL	Designated Safeguarding Lead
EDI	Equality, Diversity, and Inclusion
EHCP	Education Health Care Plan
FE	Further Education
FGM	Female Genital Mutualisation
GDPR	General Data Protection Regulation
HBV	Honor Based Violence
HR	Human Resources
KCSIE	Keeping Children Safe in Education
LAC	Looked after children
LADO	Local Authority designated Officer
PSED	Public Sector Equality Duty
PSHE	Personal, Social, Health, Economic
RSHE	Relationships, Sex & Health Education
SEND	Special Education Needs & Disabilities
SLT	Senior Leadership Team
TRA	Teaching regulation Agency
WTTSC	Working Together to Safeguard Children