West London College

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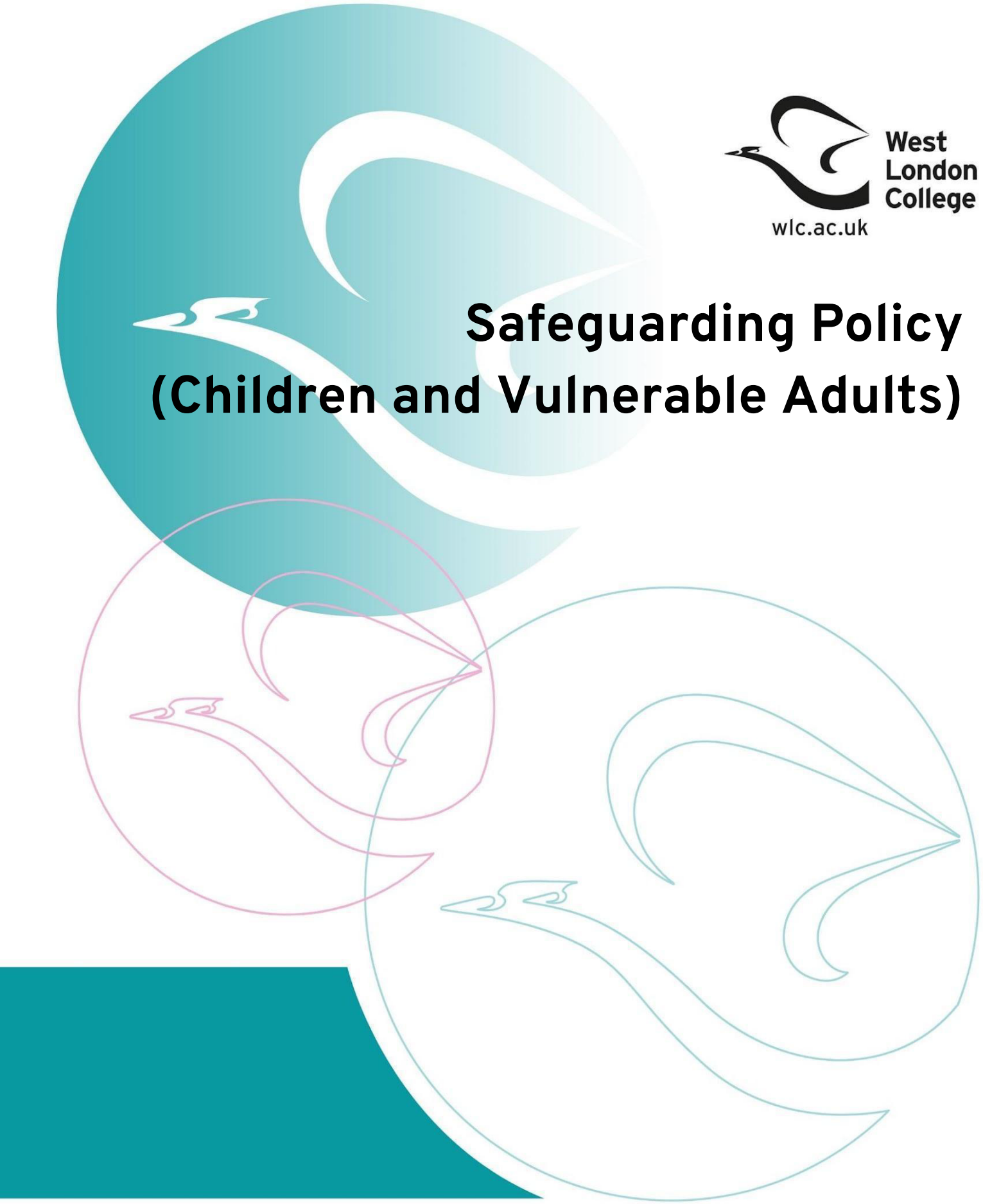
Safeguarding Policy (Children and Vulnerable Adults)



Policy Detail	Content
Version:	3
New or Replacement:	Replacement
Approved by:	
Date approved:	
Effective date:	October 2026
Author:	Alex Rolfe. Head of Safeguarding
Responsible Committee:	SLT, Safeguarding and Prevent Panel
Corporation Committee (if applicable):	Curriculum & Quality Committee
Date of next review:	October 2027
Equality Impact Assessment Date:	N/A
Lead responsibility:	Head of Safeguarding
Policy Category:	Student Services & Safeguarding

1. Purpose

1.1. The purpose of this policy is to outline West London College's principles and practice in enacting the safeguarding of learners in our care. It shows compliance with current legislation (in particular *Keeping Children Safe in Education 2026)* as well the college's proactive approach to embedding safeguarding in every aspect of college culture.

1.2. The Governors and staff at West London College recognise that young people and vulnerable adults have a fundamental right to be protected from abuse and exploitation and that learners cannot study effectively unless they feel and are safe. The college community has a strong focus on prioritising and promoting the safeguarding and protection of children, young people and vulnerable adults from harm.

1.3. West London College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering them support and protection. The college has a legal and moral duty of care to young people and vulnerable adults, to safeguard their wellbeing and to protect them from abuse. This policy stipulates that it is the duty of ***all staff*** to work together to report and respond to concerns about the welfare and safety of young people and vulnerable adults. It is essential that everybody in the college understands their safeguarding responsibilities. The college also recognises its duty to work with external agencies to ensure that risk of abuse or exploitation is properly reported and immediate action taken.

1.4. The college's safeguarding policy and practice encompasses both child and adult protection and a preventative approach to keeping learners and apprentices safe. This includes early intervention and supporting learners who present with a wide range of concerns, including difficulties with emotional and mental health, abuse and bullying by their peers, sexual harassment and violence and child criminal exploitation. We are committed to ensuring that learners are safe online and aware of the risks associated with radicalisation and extremism.

1.5. Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2026) as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment;
- 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; and
- taking action to enable all children to have the best outcomes.

'Children' includes everyone under the age of 18.

1.6. Abuse (physical, emotional, sexual or neglect) is a form of maltreatment of a child, young person or vulnerable adult. An individual or individuals may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others, for example via the internet. They may be abused by an adult or adults, or another child or children. There is increased focus on the harm which can be caused through child-on-child harassment and violence of both a physical and sexual nature.

1.7. This policy should be read in conjunction with the related documents listed in Section 19.

2. Scope

2.1. This policy concerns the safeguarding of all learners at West London College. The policy scope includes onsite learners, apprentices, learners in subcontracted provision, learners on work placements / industry placement and those undertaking projects in the community.

2.2. The policy applies to all staff, including trainee teachers, agency staff, volunteers, governors and anyone working on behalf of the college. This includes employers offering work placements, transportation companies and contractors with direct access to children and vulnerable adults.

3. Overarching Principles

3.1. The college's ethos is to provide a safe and welcoming environment for learners, staff and visitors at each of its campuses. It is committed to promoting a culture of vigilance where young people and vulnerable adults can learn and be safe. The college prioritises its duty to safeguard and promote the welfare of learners and apprentices, and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency. Staff are supported to understand vulnerability and risks in the college community and how to effectively identify and report these to the safeguarding team.

3.2. The college is committed to promoting an inclusive, anti-discriminatory culture as part of its safeguarding responsibilities. All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, and that such experiences can significantly affect a child's welfare, wellbeing and sense of safety.

4. Policy Statement

4.1. Section 175 of the Education Act (2002) requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and young people.

4.2. In accordance with the Counter-Terrorism and Security Act (2015), there is a statutory duty on colleges to *have due regard to the need to prevent people from being drawn into terrorism*. This is known as the Prevent duty. To fulfil this duty, West London College liaises closely with the local and regional Prevent leads to receive updates regarding local concerns and, where necessary, to refer learners to the Channel process. This priority is detailed in the college's Prevent Strategy and Prevent Risk Assessment and Action Plan.

5. The role of college staff and governors in safeguarding

All college staff have a fundamental role to play in identifying concerns and ensuring that early help is provided for learners and apprentices. **The college promotes a clear ethos that safeguarding is everybody's responsibility.**

5.1. *The Governing Body*

A designated governor for safeguarding is appointed and meets with the Designated Safeguarding Lead (DSL) on a regular basis. It is their responsibility to liaise with the Principal/CEO and DSL over matters regarding safeguarding and Prevent, to ensure that:

- the governing body complies with its duties under safeguarding and Prevent legislation. Governors must have regard to *Keeping Children Safe in Education* statutory guidance, ensuring that policies, procedures and training in the college are effective and comply with the law at all times.
- policies and procedures are in place in order for appropriate and immediate action to be taken to safeguard and promote learners' and apprentices' welfare and safety.
- the safeguarding policy reflects the college's approach to child-on-child abuse, sexual harassment and abuse and serious violence.
- all staff and governors read at least Part One of *Keeping Children Safe in Education* guidance.
- all staff and governors undertake safeguarding and Prevent training which is updated regularly and that the DSL, deputies and safeguarding officers receive refresher training and updating of knowledge as legislation and guidance changes.

The Governing Body must consider and approve the college's safeguarding policy and annually review its implementation.

The Chair of the Corporation is responsible for safeguarding allegations if the allegation is against the CEO & Principal and is responsible for liaising with the local authority in any such matters. The lead safeguarding governor will support the Chair with this responsibility if required. If the college or one of its subcontractors is subject to a safeguarding investigation by the police or the local authority, the lead governor must notify the Department for Education (DfE).

The judgement of the quality of leadership and management made during an Ofsted inspection includes an evaluation of the effectiveness of the safeguarding arrangements in the college to ensure that all learners and apprentices are safe and that there are safer recruitment practices. Additionally, there must be effective processes to identify, address and record incidences of sexual harassment and violence. The further education and skills inspection handbook provides guidance on the criteria which are assessed.

Governing bodies must ensure that people who pose a risk of harm to children, young people and adults at risk are prevented from working with them through rigorous safer recruitment procedures. The college has written recruitment and selection policies and procedures in place in its Safeguarding in Employment policy. At least one person on any appointment panel must have undertaken safer recruitment training.

Governing bodies and proprietors must ensure that there are procedures in place to manage allegations against members of staff and volunteers. Such allegations should be referred to the Local Authority Designated Officer (LADO); see Section 16. There must also be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

5.2. *The DSL*

The Head of Safeguarding is the leader responsible for safeguarding in the college and reports to the Assistant Principal Quality and the Learner Experience who is a member of the senior leadership team. Their role as DSL is explicit in their job description. It is their responsibility to ensure that safeguarding practice and procedures are robust and consistent across provision, including online safety and understanding the filtering and monitoring systems and processes in place at the college. The DSL acts as direct liaison and quality monitor for any external company used to operate the college's chosen filtering system.

During term time, the DSL and/or a deputy should always be available for staff in the college to discuss any safeguarding concerns. The DSL and deputies should undergo training to provide them with the knowledge and skills required to carry out the role, which is updated every two years.

The DSL will provide an annual report on safeguarding to governors and update the Governing Body on mandatory training and CPD undertaken by staff. The DSL must ensure that college policy and procedure is known, understood and used appropriately by all staff. The DSL will refer to the local authority designated officer (LADO) for advice and guidance as necessary.

The college operates an internal Safeguarding and Prevent panel, which is chaired by the DSL and reports to the senior leadership team and the Governing Body. This provides opportunities to raise awareness of current local and national safeguarding priorities, review the effectiveness of the college's safeguarding practice and policy and monitor progress against the Safeguarding and Prevent Action Plan.

5.3. *Deputy DSLs*

A core team of Deputy DSLs (DDSLs) support the designated lead in the duties summarised above to ensure that procedures are robust and followed across the college. Deputies should be trained to the same standard as the DSL.

The team is responsible for ensuring that referrals are made to social services, the police and other external agencies in accordance with local Safeguarding Partners procedures. This involves providing advice and support to staff on learner welfare and child protection issues, taking part in inter-agency meetings and ensuring that strategies and policies are agreed and effectively implemented. Duties include:

- Providing advice, guidance and training for staff on safeguarding issues
- Maintaining effective links with local multi-agency safeguarding agencies
- Managing statutory referrals made to social services and attending case conferences and strategy meetings
- Maintaining robust records of safeguarding incidents including the actions taken and when the case has been signed off as completed
- Ensuring a robust system for monitoring vulnerable learners and apprentices

5.4. *Looked After Children (LAC) Co-Ordinator*

The Children and Social Work Act (2017) places responsibilities on schools and further education colleges to promote the education of children and young people who are looked after or who are care leavers. The college's LAC Co-Ordinator leads on this requirement and works in partnership with local authority 'Virtual' Heads and advisers to support looked after children and care leavers. West London College's specific arrangements for care-experienced learners are outlined in section 8.

5.5. *Heads of Curriculum and Additional Learning Support*

The college's curriculum leaders support staff in identifying and managing concerns about the wellbeing and safety of learners and bringing this to the attention of the DSL or the DDSL as appropriate. They are also responsible for ensuring that learners and apprentices are taught about safeguarding, including online safety and Prevent, through tutorials and teaching and learning opportunities in the curriculum.

5.6. *Chief People Officer*

The Chief People Officer is responsible for delivering an effective human resources function which ensures the safe recruitment and employment of staff, DBS and barred list checks and staff mandatory training and induction. All pre-employment checks must be completed and a Single Central Record of these maintained in line with the college's Safeguarding in Employment policy . The Single Central Register is continually maintained and audited by members of the senior leadership team on a regular basis.

5.7. *College staff*

Everyone who comes into contact with learners has a role to play in identifying concerns at the earliest stage possible, sharing information and taking prompt action to prevent difficulties from escalating. A culture of vigilance is promoted to encourage staff to be aware of and report changes in learners' behaviour, absenteeism and/or disclosures that are cause for concern.

All staff complete safeguarding and Prevent training as part of their induction process. This includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Online safety is also part of the all-staff training delivered annually by the college's DSL.

Training and briefings ensure that staff are aware of the referral procedure and systems in college, who the DSL and safeguarding team are, the safeguarding policy, behaviour for learning policy and Prevent strategy. Staff are aware of which categories of learners may be particularly vulnerable (see Section 8 for specific examples) and the importance of reporting instances of young people who they are unable to contact and who may have gone missing from education.

Staff training highlights the different types of abuse and safeguarding issues which young people and adults may experience. Staff know that if they have any uncertainties about a learner's wellbeing or fear that a learner is being abused, violated or exploited or is at risk, to report their concerns immediately.

5.8. *Non College Staff on College Premises*

The college premises may sometimes be used for non-college activities involving children or vulnerable adults. In this circumstance, the college will always seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate by contacting the DSL directly. This applies regardless of whether or not the children who attend any of these services or activities are children who attend the college. The college will also 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.

6. Identification, referral and management of safeguarding concerns

6.1. It is imperative that there is a culture of safeguarding in which learners are able to approach staff to disclose problems which are affecting their lives. As a college we actively promote this and ensure that easily understood systems are in place for learners to both report concerns and to refer themselves for support. This is particularly important in sensitive matters, for example encouraging learners who have experienced sexual harassment, abuse or violence. All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe.

6.2. If a member of staff has a concern about a learner or apprentice, they must report this immediately using the online Safeguarding and Wellbeing referral form. They should also inform their line managers, but referrals should usually be made by the person who first became aware of the concern. If the concern requires immediate action (i.e. within less than one working day), the member of staff should also alert the DSL, DDSL or member of the safeguarding team that they have made a referral that requires an immediate and urgent response. In exceptional circumstances, where there is an immediate risk of harm and no DSL or DDSL is available, staff should refer directly to emergency services or social services and then follow up with the DSL as soon as possible afterwards.

6.3. All concerns are referred to the safeguarding team via an online secure referral process, so that they are risk assessed without delay, triaged, actions agreed and monitoring initiated. The Safeguarding team records cases on MyConcern, so that there is systematic record keeping and monitoring by the 'team around the learner'. Where appropriate, the referrer will be kept updated about the progress of the case and may be directly involved as part of the team around the learner.

6.4. When the safeguarding team risk assess a referral, options will then include:

- managing any support for the learner internally via the college's own pastoral support and wellbeing provision;
- initiating an early help assessment with external agencies;
- making a referral to statutory services (social services, police) as the learner may be in need or at risk of suffering significant harm,

6.5. If early help is appropriate, the DSL, DDSL or progress mentor will generally lead on liaising with other agencies and set up an inter-agency assessment as appropriate.

6.6. Where it is determined that further advice, guidance or support is required from external agencies, the safeguarding team will follow the procedures set out by the local Safeguarding Partners in the relevant borough.

6.7. Where there are concerns about a learner's welfare and the learner is suffering or at risk of suffering from harm, the Safeguarding Team will make a referral to children's or adult social care, child or adult mental health services, and, if appropriate, the police.

6.8. The safeguarding team also liaises with local authorities in a learner's home area or the area in which abuse is alleged to have taken place and will follow the necessary safeguarding partners arrangements in that locality to address concerns and the need for intervention and support.

6.9. *Record keeping*

Maintaining timely and detailed records is essential to effective safeguarding practice. Records should include a clear and comprehensive summary of the concerns; details of how the concerns were followed up and resolved; a note of any action taken, decisions reached and the outcome.

The college's safeguarding record-keeping system is MyConcern, a secure recording and monitoring platform that documents and tracks safeguarding cases, ensuring that sensitive information is shared confidentially within the safeguarding team and on a need-to-know basis. Safeguarding staff are trained to use the system and to keep records up to date.

7. Information sharing

7.1. Sharing information is a fundamental aspect of safeguarding. Poor or non-existent information sharing has been identified as a repeated factor in Serious Case Reviews (SCRs) carried out following the death or serious injury of a child. If a staff member has a concern about the welfare or safety of a learner or apprentice, they must share this immediately via the process described in Section 6.2. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping a learner safe.

7.2. Where possible and appropriate, learners and/or their parents/carer should be informed about any sharing of their personal information with external agencies. Staff should explain what is being shared, with whom, and the reasons for doing so. However, consent is not required from children or adults to share information for safeguarding purposes.

7.3. The college has due regard to the General Data Protection Regulation (GDPR), the Data Protection Act (2018) and adheres to Government advice *in Information sharing: advice for practitioners providing safeguarding services (2018).* This clarifies that:

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

7.4. At West London College, information sharing practice is based on the above guidance and the *seven golden rules to sharing information.* This means ensuring that the information staff share is *necessary, proportionate, relevant, adequate, accurate, timely and secure.* The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child, young person or adult at risk. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

8. West London College's arrangements for learners with additional vulnerabilities and those in specific learning contexts

Whilst all learners should be protected, there are some groups who are potentially at greater risk of harm. The college ensures that there is additional support and monitoring of these learners.

8.1. *Care-experienced Learners*

Children in care, or young people under 25 who have been in care, may be particularly vulnerable and have additional specialist support from their Local Authority's Social Services and Virtual School. A dedicated LAC Coordinator is responsible for:

- identifying and supporting these learners in college, offering one-to-one support as needed;
- liaising with external agencies that are supporting them;
- attending regular PEP meetings with Virtual Schools to monitor LAC learners' progress;
- liaising with foster carers and residential settings;
- staying up-to-date with relevant guidance and legislation;
- Ensuring that Curriculum staff know who the LAC learners are in their areas and what their additional needs are.

Heads of Curriculum, teachers and tutors should know which of their learners are care-experienced and ensure they're achieving in line with their peers, raising any concerns with the LAC Co-Ordinator and feeding into PEP meetings as required.

8.2. *Learners with social workers*

Local Authorities should make the college aware if a learner has an allocated social worker or if social services become involved with the family while the learner is at college. This helps the college ensure that the learner is receiving the right support in and out of college and that there is effective liaison and information-sharing with statutory services. Where appropriate, safeguarding staff from the college will attend meetings with social services, such as Child in Need (CiN) meetings, Child Protection (CP) Conferences, etc.

8.3. *Learners requiring mental health support*

All staff should be aware of the prevalence of mental health difficulties among children and adults and the need for treatment and support. Poor mental health can also, in some cases, be an indicator of abuse, neglect or exploitation. The Progress Mentors and Safeguarding Team refer or signpost learners to external mental health services as needed. Where a learner appears to be in a mental health crisis, the safeguarding team will ensure they have the immediate support needed to keep them safe, via internal support from Specialist Mental Health Wellbeing Mentors, their Mental Health Trust's Crisis Line, Mental Health Teams, A&E or Emergency Services.

Staff should be alert to potential warning signs that a learner is struggling with their mental health, including significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, disengaging from activities they usually enjoy, and physical signs of self-harm or self-neglect. Any of these signs should be reported to the safeguarding team without delay, in line with Section 6.2.

Where a member of staff believes a learner is in immediate danger, they must call 999 or take the learner to A&E immediately; where the concern is urgent but not an emergency, staff should call 111 and inform the DSL or a DDSL as soon as possible afterwards.

8.4. *Children Missing in Education / Absent from Education*

The college recognises its duty to establish, as far as possible, the reasons why learners are missing from their programme. When a child or vulnerable adult runs away or goes missing, they are potentially at risk of serious harm. Every missing episode requires intervention from the safeguarding team, working in partnership with the police and social services. The safeguarding team will always put in place appropriate safeguarding responses for children who go missing from education, particularly on repeat occasions, in partnership with statutory agencies, to help

identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

In addition, children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. The college will seek to address any issues with absence when they are first emerging but also where children are already known to children's social care, where being absent from education may increase known safeguarding risks within the family or in the community. Where a safeguarding concern is identified as a reason for absence, the safeguarding team will always involve partner agencies in its response.

8.5. *Learners with a learning difficulty or disability*

Learners with learning difficulties and/or disabilities may have additional vulnerabilities and safeguarding challenges. The college will ensure that these learners and their parents/carers are made fully aware of safeguarding procedures during the transition to college, at application, enrolment and induction. Information is delivered and adapted so that it is accessible and meets individual needs.

8.6. *Learners aged 14-to-16-years old*

Primary responsibility for any school pupil attending day link programmes at a West London College campus lies with the home school. Any incidents or issues with the safeguarding of a young person should be referred to the college's DSL or a DDSL who will then liaise with the relevant safeguarding contact at the home school.

8.7. *Learners with English as a Second Language (ESOL) or Foreign Language (EFL)*

The college ensures that for learners where English is not their first language, information on safeguarding and Prevent is provided in an accessible format to promote full understanding.

8.8. *Apprentices*

All learners on work-based programmes receive an induction, which includes raising awareness of the college's commitment to safeguarding and preventing radicalisation and extremism. Apprentices' understanding of safeguarding, preventing extremism and radicalisation and safe working practices, is discussed and checked at each review by their Skills Trainer. The opportunity to discuss any concerns is provided. Apprentices are signposted to information about safeguarding in the college and workplace and given details of who to contact if they have a concern.

Prior to work-related activities commencing, the college carries out the following checks:

- Pre-placement health and safety checks of employers' premises and health and safety management, including insurance details

- Employers are made aware of the relevant college policies
- The requirements for DBS checks are assessed and relevant processes undertaken as required.

8.9. *Learners on programmes in subcontracted provision*

All learners on courses delivered by a subcontracted college partner receive details of the support services offered and contact details of the college's DSL and safeguarding team.

The college carries out thorough due diligence for all new subcontractor partners, prior to any contract commencement. This includes:

- Ensuring that the provider has a robust safeguarding policy and procedures in place which meet the statutory requirements of KCSIE
- Completion of a training facility health and safety checklist
- Completion of a risk assessment of the premises
- Checking and copying of insurance documents
- Checks to ensure that the partner does not have any links with extremist organisations or organisations that would not adhere to the guidelines contained in this policy
- Completion of a statement of good standard confirming compliance with the college's Safeguarding Policy and Prevent Strategy

8.10. *Subcontractors are required to ensure that:*

- All staff who are in contact with learners under the age of 18 are DBS checked and their details monitored and updated as necessary
- All learners receive induction in safeguarding and preventing radicalisation and extremism
- All delivery staff complete safeguarding and Prevent training

The understanding of all aspects of safeguarding, including preventing radicalisation and extremism and safe working practices, is checked at each partner review. An annual review of the partner's Safeguarding Policy and Prevent Strategy is undertaken.

8.11. *Learners on work experience and placement*

The college has a work experience policy in place which sets out the requirements for the health, safety, welfare and safeguarding of learners who attend work experience and placements with employers. Any concerns which arise for learners in the workplace, relating to their own wellbeing or about professional behaviour of a staff member, should be reported to their tutor or a member of the safeguarding team. If an employer has a concern about the welfare, wellbeing or safety of a learner on

placement with them, they should contact the work experience coordinator to report this.

8.12. *LGBTQ+ Learners*

A learner being LGBTQ+ is not in itself an inherent risk factor for harm. However, learners who identify or are perceived at LGBTQ+ may be subject to bullying, discrimination or abuse, either within or outside the college. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for learners to speak out or share their concerns with members of staff. The college has a zero tolerance for any kind of LGBTQ+ discrimination or bullying, and staff will actively challenge any unacceptable behaviours. Tutorials will be used to ensure LGBTQ+ learners are aware of their access to support and can trust their tutor to help them.

8.13. *Learners affected by racism or faith-targeted abuse*

Racism, faith-based prejudice and other forms of discrimination are a form of harm in their own right and can significantly affect a child's welfare, wellbeing and sense of safety. This includes prejudice or abuse directed at a learner's actual or perceived race, ethnicity, nationality or religion, including antisemitism and anti-Muslim prejudice. Such experiences can affect a learner's mental health and their willingness to seek help and may occur alongside other forms of abuse or exploitation. Staff should be alert to the signs and impact of prejudice-based harm and consider it within safeguarding practice where appropriate, rather than treating it solely as a behavioural or disciplinary matter. The college has a zero-tolerance to racism and faith-based discrimination, and staff will actively challenge such behaviour and support affected learners. Concerns should be reported to the DSL in the same way as any other safeguarding concern.

8.14. *Gender-Questioning Learners*

Where a learner or their parent/carer raises a request relating to social transition (which may involve a change of name, pronouns, uniform or appearance), staff should respond with professional curiosity about the learner's experiences and any potential vulnerabilities, avoiding rigid approaches based on gender stereotypes.

The college will not initiate a learner's social transition; this process applies only where a learner or parent/carer raises the request. Such requests are expected to be rare and will be approached with caution. Any request should be referred to the DSL at an early stage, who will consider any safeguarding implications and ensure the decision and reasoning are recorded.

Parents/carers of learners under 18 should normally be involved in these discussions. Parents/carers may only be excluded from discussions where doing so would place

the learner at risk of harm; the threshold for exclusion is high, and any decision to exclude parents/carers must be made by, or in consultation with, the DSL and supported by clear, recorded safeguarding reasoning.

9. Child-on-child abuse, sexual harassment and violence

9.1. All staff are made aware of the importance of identifying, challenging and reporting inappropriate behaviours between learners and concerns of bullying, abuse, harassment and violence between peers. The college recognises that in some, but not all, forms of child-on-child abuse it is more likely that girls will be victims and boys will be perpetrators; all child-on-child abuse is unacceptable and will be taken seriously regardless of the gender of those involved. Child-on-child abuse can include but is not limited to: physical assault and harm, or threat of harm involving a weapon; harmful sexual behaviour including misogyny, sexual violence and sexual harassment; and the consensual or non-consensual sharing of self-generated intimate images or videos, including those created or altered using AI, for example deepfakes and discriminatory behaviour, including racism and faith-targeted abuse. All staff are required to have read Part one of KCSiE 2026, which describes child-on-child abuse in detail.

9.2. In all instances of child-on-child abuse, sexual harassment or violence, staff must report this immediately to the safeguarding team for action and investigation.

9.3. Where an incident is related to behaviour in and around the college, this may also be addressed through the behaviour for learning procedure. Parents will also be notified in any instances of child-on-child harassment and abuse.

9.4. Staff must report any concern that a learner is using or carrying a weapon, or has expressed intent to do so, to the DSL or a DDSL immediately. The DSL or DDSL will assess the level of risk and determine the appropriate action, which may include a statutory referral under Section 6.

9.5. Where a safeguarding concern involves conflict between learners, the DSL is responsible for assessing and, where appropriate, de-escalating that conflict, working with the Behaviour for Learning procedure and external agencies as necessary.

10. Sport

10.1. Where relevant to the college's sporting and enrichment provision, including activities involving learners aged under 18, the college recognises that learners may be separated according to their biological sex where the physical strength, stamina or physique of the average female would place her at a disadvantage in competition with the average male, or vice versa. Where sport must be delivered in single-sex groups

from a particular age to ensure participants' safety, no exceptions will be made to that single-sex grouping. Decisions of this kind will be applied consistently and communicated sensitively to the learners affected. They do not remove a trans learner's protected characteristic of gender reassignment under the Equality Act 2010, or their entitlement to be treated with dignity and respect in all other aspects of college life.

11. College Premises

11.1. Consistent with KCSIE 2026, and where applicable to the college's estate and to any learners under 18, the college will maintain separate toilet facilities for males and females and learners should not use toilet facilities designated for the opposite biological sex. Learners should not be required to undress in front of learners of the opposite biological sex, and overnight accommodation arranged for college trips will remain single sex.

11.2. Where a learner does not wish to use the toilet, changing room or shower facility associated with their biological sex, the college will treat the request sensitively and confidentially and will consider whether an alternative facility (such as a self-contained, lockable individual room) can be provided without compromising the provision of single-sex facilities, or the safety, comfort, privacy or dignity of that learner or of other learners. A learner's transgender status or a request of this kind is confidential information and does not, of itself, constitute a safeguarding concern. A clear record will be kept of any such request and the college's response, held in line with the college's data protection policy. This clause operates alongside, and does not remove, any protection a learner may have under the protected characteristic of gender reassignment in the Equality Act 2010.

12. Opportunities to teach safeguarding

12.1. There are a number of ways in which learners and apprentices are taught about safeguarding, online safety, college safeguarding procedures and who to speak to:

- Information about safeguarding provision is introduced at open events
- Further information is provided upon application and enrolment at college
- Learner induction includes presentations and discussion on what safeguarding and Prevent mean, how to report concerns and contact safeguarding team members. All learners are given access to an online course handbook which also provides information on safeguarding, Prevent and how to stay safe online.
- Learners are provided with guidelines about keeping themselves safe online as part of their induction into using the college's IT network and this also forms a

part of the induction and tutorial programme. Further details are available in the college's Online Safety policy

- In line with updated Relationships and Sex Education & Health Education (RSHE) expectations from the Department of Education (2026), tutorial and enrichment content will address emerging themes such as sexual harassment, misogyny, incel-related harms, online image-based abuse, and coercion. Tutorial and enrichment activities also encompass a wide range of topics to raise awareness of physical and mental health and wellbeing, online safety, anti-bullying, drugs and alcohol, the dangers of being drawn into extremism and radicalisation, consent and sexual ethics, positive conceptions of feminity and masculinity, financial exploitation, risks in the community and how to stay safe.
- Student Services staff provide access to information, advice and guidance, pastoral and wellbeing support for all learners.
- Learners are encouraged to build effective relationships with their tutors to discuss any issues of concern. Posters are displayed around the college campuses providing details of the safeguarding team.
- Learners can refer themselves to the safeguarding team via the online referral form. This is also available via a QR code on posters around the college.
- Safeguarding information and key contacts are available on the college website and on the learner portal.
- There is a specific focus on creating a safe culture in which to disclose personal and sensitive issues, particularly relating to sexual harassment, abuse and violence.
- External agencies provide workshops on key themes including 'what is consent?'; recognising and responding to sexual violence against females and males.

13. Staff training and induction

13.1. Staff, agency staff and governors, are required to complete mandatory safeguarding and Prevent training at the beginning of each academic year and as part of their induction, to ensure that they are aware of their safeguarding responsibilities and of the college's policy and procedures. The training includes recognising the signs of abuse and reporting suspected abuse. In addition:

- All staff are required to demonstrate that they have read and understood the updates to the annual guidance in Part 1 of *Keeping Children Safe in Education.*
- The DSL and DDSLs complete Level 3 safeguarding training, have refresher training every two years, and ensure that they keep fully apprised of changes to safeguarding legislation and guidance.

- Staff who are involved in recruitment must undertake Safer Recruitment training. At least one member of every interview panel must have completed Safer Recruitment Training.
- All training is recorded on staff training records.

14. Online safety

14.1. Ensuring that learners are safe online, whether using college equipment or their own devices, is a high priority. This involves raising awareness throughout the whole of the college community about the risks and best practice online including harmful contents and the risks of misinformation, disinformation (including fake news) and conspiracy theories. West London College has adopted the DfE's filtering and monitoring standards in full: monitoring of all college devices' online activity is carried out by the college's systems and flags concerns to the DSL and DDSL within minutes. For more detail, see the Online Safety Policy. The effectiveness of the college's filtering and monitoring systems will be formally reviewed at least once every academic year, in line with KCSIE 2026, with outcomes reported to the DSL senior leadership team and the governing body.

14.2. In line with the Department for Education's 2025 guidance on Generative AI Product Safety Expectations, the College is committed to ensuring that any use of generative artificial intelligence (AI) tools within the institution prioritises the safety, privacy and wellbeing of learners. All AI tools used or recommended by the college must meet minimum safety standards, including transparent risk assessments, appropriate data protection measures, and safeguards about harmful, biased or misleading outputs. Staff are required to evaluate the educational purpose and potential safeguarding implications of AI tools before deployment, and to report any concerns about AI misuse or risk the College's safeguarding procedures. Any use of AI to harass, impersonate, manipulate, or produce inappropriate or synthetic content will be investigated as a safeguarding and potential criminal matter. Learners are also supported to develop critical literacy when evaluating AI-generated material. This is supported by reference to the DfE's 'Generative artificial intelligence in education' guidance, and the college's safeguarding training reflects the updated online risk categories in KCSIE 2026 to account for the increasing presence of AI.

15. Involving parents and carers

15.1. The college is committed to ensuring that parents/carers of learners aged under 18 understand the college's responsibility to safeguard and promote the welfare of its learners.

- Parents/carers are informed about the college's safeguarding policy and procedure at open events and when learners start their courses at college. It is stated that staff will need to share information if there are concerns about a child's welfare.
- The learner's tutor, Head of Curriculum or member of the safeguarding team will contact parents/carers to discuss any concerns which arise about the learner's wellbeing, except in exceptional cases where doing so might place the learner at greater risk of harm.
- The college obtains up-to-date and accurate information in order to keep learners and apprentices safe including (i) names and contact details of the person(s) with whom the learner resides (ii) names and contact details of the person(s) with parental responsibility, if different from (i) (iii) emergency contact details. Two contacts will always be sought.

16. Allegations made against staff including supply teachers, volunteers and contractors

16.1. West London College has processes and procedures in place to manage safeguarding concerns about staff members, including trainee teachers, agency staff, volunteers and contractors.

KCSIE (2026) identifies two levels of concern:

1. Allegations that may meet the harm threshold
2. Allegations/concerns that do not meet the harm threshold. These are referred to as 'low level concerns'

16.2. *Allegations that may meet the harm threshold*

Should an allegation be made against a member of staff or volunteer who has, for example:

- behaved in a way that has harmed a child/vulnerable adult or may have harmed a child/vulnerable adult.
- possibly committed a criminal offence against or related to a child/vulnerable adult.
- behaved towards a child/vulnerable adult in a way that indicates that they may pose a risk of harm to children/vulnerable adults.
- behaved towards a child/vulnerable adult in a way that indicates that they may be unsuitable to work with children/vulnerable adults.

The following procedures must be followed in order to look after the welfare of the learner involved and to investigate and support the person who is the subject of the allegation:

The member of staff or person receiving the allegation, or having the concern, must immediately inform the DSL or the Chief People Officer.

Where it is identified that a learner has been harmed or that there may be immediate risk of harm, or if the situation is an emergency, the college's safeguarding referral procedure should be followed.

The DSL, Chief People Officer or appropriate senior leader on all such occasions will discuss immediately, on the same working day, the content of the allegation with the Local Authority Designated Officer (LADO).

The LADO will advise on the process to manage the allegation. A 'case manager' in the college will be appointed to lead the investigation. This will be a member of the college's leadership team. Where the principal is the subject of an allegation, the chair of governors will act as case manager.

The DSL and senior leadership team should ensure they understand the local authority arrangements for managing allegations and the information the LADO will require when an allegation is made. This is provided in the procedural guidance provided by the LADO service.

Where it is clear that an investigation by the police or children's social care is not necessary, the LADO should discuss the next steps with the case manager.

If the college receives an allegation relating to an incident that happened when an individual or organisation was using college premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) the college will follow our normal procedures, including informing the LADO

16.3. *No further action*

Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned and by whom.

16.4. *Further enquiries*

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to colleges when considering allegations against staff. Their role is not to investigate, but to ensure that an appropriate investigation is carried out by the college.

16.5. *Suspension*

Suspension should not be an automatic response when an allegation is reported. The case manager must consider carefully whether the circumstances warrant suspension from college or until the allegation is resolved.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for this course of action. Where it has been deemed appropriate to suspend the individual, written confirmation should be given within one working day, giving as much relevant detail for the reason. Permission for suspension can only come from the DSL or Chief People Officer. The Principal/CEO must also be informed.

16.6. *Confidentiality and information sharing*

During the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation and about the alleged victim.

The college must make every effort to maintain confidentiality while an allegation is being investigated or considered.

16.7. *Allegation outcomes*

The definitions used when the college determines the outcome of an allegation are as follows:

- Substantiated
- Malicious
- False
- Unsubstantiated
- Unfounded

The options following on from the investigation outcome will range from taking no further action to dismissal. If the allegation is substantiated and the person is dismissed, resigns or the college ceases to use a contracted service, there is a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

16.8. *Low-Level Concerns (Concerns that do not meet the harm threshold)*

A low-level concern is any concern, no matter how small, which causes a sense of unease or doubt regarding someone's suitability to work with children or vulnerable adults. KCSIE provides examples of such behaviour to include:

- being over-friendly with learners
- having favourites
- taking photographs of young people on their mobile phone

- engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

It is imperative that any such concerns are shared with the DSL, recorded in writing and dealt with appropriately. The record should include details of the concern, the context in which the concern arose, and action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. This may move the concern to meeting the harm threshold or disciplinary action.

17. Safer recruitment

17.1. West London College is committed to promoting a culture of safe recruitment and, as part of that, adopting recruitment procedures that deter, reject or identify people who might harm children or vulnerable adults. At least one person on every interview panel must have completed Safer Recruitment training.

17.2. Governors should ensure that there are effective processes in place for arranging checks, including DBS, identity, right to work in the UK and any required overseas police checks, often called a 'Certificate of Good Conduct'.

17.3. The governing body must ensure that all appropriate suitability checks have been undertaken and that the college maintains a Single Central Record (SCR), detailing the range of checks it has carried out on its staff. The SCR is reviewed regularly to ensure that it is being kept accurately.

17.4. When making appointments, the mechanisms must be in place within the college to check that any person employed to teach has the required teaching qualifications and has successfully completed any statutory induction required.

17.5. Details of the college's safer recruitment policy and procedure are available in the Safeguarding in Employment policy.

17.6. As part of the shortlisting process, the college will always carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the college might want to explore with the applicant at interview. The colleges will inform shortlisted candidates that online searches will be done as part of due diligence checks

18. Relevant Legislation / Regulation

18.1. This policy is underpinned by two key pieces of statutory guidance:

- *Keeping Children Safe in Education (KCSiE), September 2026*
- *Working Together to Safeguard Children, December 2023*

18.2. The college is committed to working in partnership with external agencies to perform its duties under the Education Act 2002, Children Act 2004, Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2026.

18.3. The policy is informed by and meets the requirements of the following:

Children's Safeguarding and Child Protection

- *Keeping Children Safe in Education 2026*
- *Guidance for Safer Working Practice in Education Settings 2022*
- *Further education and skills inspection handbook 2024*
- *Working together to Safeguard Children 2023*
- *Mental health and behaviour in schools 2018*
- *Children and Social Work Act 2017*
- *Children and Families Act 2014*
- *The Children Act 2004*
- *Education Act 2002*

Adults at risk

- *The Care Act 2014 – statutory guidance*
- *Safeguarding Vulnerable Groups Act 2006*

Preventing radicalisation and extremism

- *Prevent duty guidance: England and Wales (statutory as of December 31st 2023)*
- *Counter Terrorism and Security Act 2015*

Safer recruitment

- *Sexual Offences Act 2003*
- *Disclosure & Barring Service 2013*

19. Related Documents

19.1. The following related documents are relevant to this policy / procedure:

- Student Attendance and Engagement Policy
- Promoting Positive Relationships and Behaviour for Learning Policy
- Learner Code of Conduct
- Fitness to Study Policy

- Online Safety Policy
- Prevent Strategy, Risk Assessment and Action Plan
- Staff Code of Conduct
- Equality, Diversity and Inclusion Policy
- Criminal Conviction Disclosure and Risk Assessment Policy and Procedure

20. Accountability

20.1. The Designated Safeguarding Lead is responsible for the drafting and implementation of this policy.

20.2. They are also responsible for ensuring that this document is reviewed and updated **at least annually as per legislation** and is the first contact point for managers seeking advice and guidance about the Safeguarding Policy or making enquiries about its interpretation.

20.3. All managers are responsible for ensuring that they and their team members follow the requirements set out in this document.

20.4. All employees are responsible for adhering to the requirements set out in this document.

21. Equality, Diversity & Inclusion

21.1. The College has paid due regard to equality considerations during the preparation and implementation of this Policy.

21.2. These considerations included the potential for any differential negative effect on the grounds of age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage or civil partnership.

21.3. The College's judgement is that there is no such negative effect on those grounds and, consequently, no potential breach of the Equality Act 2010.

21.4. The operation of this Policy and Procedure will be monitored by the Executive Chief People Officer in order to establish that no unlawful discrimination is taking place and to identify opportunities for the College to enhance equality of opportunity and fair treatment.

22. Review

22.1. This document will be reviewed by October 2026. In addition to the scheduled October 2026 review, this policy will be updated immediately in response to material change in statutory guidance, including updates to KCSiE or RSHE.

22.2. The DSL will undertake this review, taking into account the outcomes of the monitoring process, legislative changes and developments in good practice.

22.3. As part of the review, the DSL will seek and consider the views of the College's employees and, where appropriate, of the recognised trade unions.

22.4. The outcome of the review will be reported to the Senior Leadership Team.

22.5. An annual report for governors is produced in the autumn term, detailing the range of activity in the college relating to safeguarding and Prevent measures. This enables the Governing Body to assure itself that the college leadership is discharging its safeguarding duties effectively. It also identifies areas for further improvement in the next academic year.

22.6. A Safeguarding and Prevent Action Plan is used as the basis for developing the college's practice and provision on a continuous basis.

23. Policy Category

Policy Detail	Content
Category	☐ Business Development, Marketing and Subcontracting ☐ Corporation ☐ Data Protection ☐ Equality & Diversity ☐ Estates / Facilities ☐ Executive Support, Administration and Reception ☐ Finance ☐ Health and Safety ☐ International ☐ IT Services ☐ Management Information Systems ☐ People and Organisational Development ☐ Quality X Student Services & Safeguarding
Audience	X Employees X Governors X Learners X Partners X Suppliers

Appendix 1. The college's safeguarding team and contact details

James Taylor – Deputy Principal Curriculum and Quality – ext. 1229, j.taylor@wlc.ac.uk

Sabeena Shah – Assistant Principal Quality and Learner Experience – ext. 2036, s.shah@wlc.ac.uk

Alex Rolfe – Designated Safeguarding Lead (DSL) – ext. 2319, Mobile 07824 383638, a.rolfe@wlc.ac.uk

Sajada Sajid – Assistant Principal for Ealing (DDSL trained) – ext. 6122, s.sajid@wlc.ac.uk