Safeguarding Policy

OWNED BY:	**VP Student Experience & External Relations (DSL)**					
DATE OF LAST REVIEW	**September 2026**					
PLANNED NEXT REVIEW:	**September 2027**					
APPROVAL:	**Corporation**					
APPLIES TO:	**Staff**	✓	**Student**	✓	**Public**	✓

Document History

Changes to grammar, spelling and sentence structure may have been made throughout the document. In addition to these minor changes, the following have been made

Version	Date	Changes made
26v1	July 2026	Changes to update in line with KCSIE 26 including: - Changes to definition of safeguarding - Changes to terminology around partners - Wording relating to periodic checks of DBS for high risk roles - All staff are now required to read all of part 1 - Expanded sections on early help, misuse of AI and deepfakes, gender questioning, misogyny as a serious safeguarding concern, serious violence and exploitation, party to or witnessing domestic abuse, child-on-child abuse. - Expanded section covering security and access management of personal data, protection of images on-line and internet filtering. - Added policies – Allergy Safety and Fitness to Study

1. Introduction

This Safeguarding Policy is to enable the College to identify concerns early, provide help to children and young people and to prevent concerns from escalating. It facilitates the provision of a safe environment in which young people can learn. It is in line with the statutory guidance in Keeping Children Safe in Education updated September 2026 which defines safeguarding as:

Protecting children and young people from maltreatment; preventing impairment of their mental and physical health or development; ensuring they grow up in circumstances consistent with safe and effective care; and taking action to enable all children and young people to have the best outcomes.

2. Aims

The Safeguarding Policy relates to all those engaged in regulated activity, and those who are on site whilst regulated activity is being delivered. This includes the actions of all staff, governors, visitors, contractors, and individuals in a position of trust in the College.

Cirencester College is committed to a young people centred and coordinated approach to safeguarding.

To this end, the College will ensure that everyone is aware of their responsibility and will effectively promote the safeguarding and welfare of all young people and aim to provide a safe environment in which young people can learn, feel safe and flourish.

We will practice vigilance, identify concerns early, provide help and advocacy for our young people and prevent concerns from escalating. We will record and share information centrally and appropriately to ensure everyone who encounters a young person can add to a 'fuller picture' and fulfil their responsibility effectively.

We will continuously work to provide an environment in which young people feel safe, secure, valued, and respected, and feel confident that any complaint, allegation or suspicion of abuse will be taken seriously.

3. Scope

The Corporation takes seriously its responsibility to safeguard and protect the welfare of all young people (children) in its care who may be on the site legitimately. It has a moral duty and statutory obligation under Section 175 of the Education Act 2002 (as amended) and the Apprenticeship, Skills, Children and Learning Act 2009 (as amended), to all children and young people under 18 years of age or 19 years if engaged in the continuance of full-time study or vulnerable adults who attend Cirencester College or are on the site (legitimately) for other reasons.
The College works in partnership with safeguarding partners and other agencies in accordance with the Children Act 2004, Working Together to Safeguard Children 2023, Keeping Children Safe in Education 2026 and local multi-agency safeguarding arrangements.

The College recognises that it is an agent of referral and not of investigation. It is not the College's responsibility to investigate abuse. Staff should not extend an offer of confidentiality but should clearly inform the person that, if information about abuse is disclosed, there is a duty on staff to follow reporting procedures.

For the purpose of Safeguarding, this policy covers all young people up to 18 including:

- Students and prospective students under 18 years of age enrolled on full and part-time courses and apprenticeships.
- School-link students.
- Visitors to the College (under 18) including those attending events in hired college spaces.
- Employees, work experience students or volunteers who are under 18 years of age.

4. Responsibilities

The College will:

Staff Recruitment and Training

Appoint and train a Designated Safeguarding Lead at senior management level, and at least two deputies who will co-ordinate the College's Safeguarding Procedure, and make these people known to all. These Safeguarding Leads will attend regular updating training and access support from the local Safeguarding Partners and the Multi-Agency Safeguarding Hub [MASH].

Recruit and train employees to safeguard young people from abuse, and themselves from false allegations. Ensure the recruitment process includes completion of an application form, appropriate references and DBS checks on all new staff – for early starters, a List 99 check accompanied by reference checks and an appropriate risk assessment will be in place until DBS is returned and recorded. At least one member of every interview panel will be safer recruitment trained; all recruiting managers to be safer recruitment trained.

Undertake on-line searches in the form of a cursory search engine search for name, location and images, as part of the recruitment process, where it is believed appropriate or necessary. Applicants will be informed of the possibility of a search from the outset.

Have in place a process to ensure that all staff have a DBS with a date ideally no older than indicated below:

Category of staff	**Good practice renewal period**
High risk plus those who go into schools/hospitals eg Schools Liaison, LSWs and Pastoral, DSL and DDSLs, teachers on childcare/health.	On update service renewed/ checked annually
Staff who have daily student close contact in 1:1, support or teaching capacity eg Lecturers, coaches, security	Ideally renew DBS every 3-5 years
Staff who have access to student data for their role	Renew DBS every 5-7 years
Staff with intermittent, limited or rare access to students eg refectory staff, site services, finance, HR	Renew every 10 years
Staff with no contact or supervised contact with students who are on site at the same time as people in scope for KCSIE	DBS on appointment only
Staff with no contact with young people eg those who work with adults in the evening or off-site	No DBS
A paid activity coach or volunteer (paid or not) who teaches, trains, instructs, cares for or supervises children often enough (on more than 3 days in any 30-day period), or overnight, they will be in regulated activity with children (from 1/9/26) even if someone else supervises them.	DBS on appointment

The College may undertake periodic DBS re-checks based on assessed risk and role requirements. Updating and new staff will be asked to join the on-line update service to facilitate an annual check for high-risk roles.

Provide training for all staff on the current Safeguarding and Prevent agendas, including recognising abuse and neglect, sexual harassment and issues of consent, on-line safety, radicalisation, responding appropriately to concerns relating to suspected, alleged or disclosed abuse, recording, reporting, information sharing and confidentiality as appropriate.

All permanent staff will undertake full Safeguarding, Prevent Duty, Data Protection, and on-line safety training on joining the College and this will be renewed every three years. Completion of probation is dependent upon completion of this training. Occasional staff, such as invigilators, will receive safeguarding training as part of their annual briefing.

All permanent staff are required to read and understand Part One of KCSIE annually and will receive on-going updates, at least annually, which will include the types of cases the College has encountered in the year and highlight concerns at that moment and going forward.

The Safeguarding team and the wider Pastoral team will all undertake Advanced Safeguarding/Child Protection L3 training and renew every two years.

Student Awareness and Support

As part of induction and ongoing taught tutorial programme, provide students and apprentices with learning about the risks they may face, what is and is not acceptable behaviour and how to raise a concern or access support, for themselves or someone of concern, as required.
Use the curriculum and tutorial programme:

- to help young people to develop self-esteem, assertiveness, and promote their resilience in both face-to-face and on-line situations.
- to educate students on the safe and responsible use of AI and respond appropriately to any safeguarding concerns arising from its misuse.
- To promote respectful relationships, challenge harmful attitudes and behaviours, and respond appropriately to concerns involving misogynistic conduct both online and offline

Have procedures in place to ensure visitors are appropriately screened, accompanied and have restricted access to students.

Provide method of distinguishing adult students on daytime courses where they may be with young people.

Provide opportunities for children, young people and vulnerable adults to talk about concerns relating to their welfare through tutors, teachers, the pastoral team and professional support.

Provide support and advocacy for young people who have disclosed abuse and for the staff who have experienced disclosure.

Provide information to employers about their safeguarding responsibilities when working with college students, providing training where needed, ensuring employers have a reporting mechanism for support and guidance on any safeguarding concern.

In Practice

Promote effective working relationships with safeguarding partners, especially the police and the local Children's Services and Multi-Agency Safeguarding Arrangements (through the College's Designated Safeguarding Lead and Deputy Designated Safeguarding Leads).

Provide a systematic means of monitoring young people, particularly those known, or thought to be at risk of harm, and contribute to assessments of need and support plans for them, in conjunction with Early Help and Family Help services and local referral pathways. This includes any concern flagged by an industrial placement aligned to their programme of study and/or as a result of internet filtering and monitoring.

Respond promptly, within the timescale laid out in the procedures, to allegations of abuse or abuse of trust made against employees or volunteers or incidents of suspicious poor practice, implementing the appropriate disciplinary and appeals procedures. Such concerns will be referred to the Designated Safeguarding Lead (DSL), the HR Manager and the Principal. The area's protection procedures will be followed. The Local Authority Designated Officer (LADO) will be informed.

The College will not tolerate inappropriate behaviour and has a Whistleblowing Policy to protect staff who disclose information regarding abuse or inappropriate behaviour by a colleague at any level or other adult towards young people.

All individuals, including those in a position of trust, are expected to always act professionally including understanding appropriate boundaries, being familiar with college guidance on safe practice and recognising the indicators of abuse in any form. This includes the need to:

- Behave, dress, and talk to young people in an appropriate way whether in person or on-line.
- Avoid situations where they may be at risk of false allegations, or act to reduce that risk.

- Report and seek the advice of their line manager if they are concerned about a situation, such as a young person having a crush on them or believe an incident may have been misconstrued.
- Be vigilant and sensitive to situations where a young person may be vulnerable and/or at risk. Develop their understanding of the signs and indicators of abuse including, but not exclusively, radicalisation, domestic abuse (including witnessing domestic abuse), implications of being 'missing from education', homelessness, substance misuse, serious violence, forced marriage, FGM, and honour-based abuse.
- Know college procedures, including how to respond to a young person who discloses abuse or has witnessed abuse.
- Know and comply with requirements for recording all concerns and comments and passing them onto the Safeguarding Team.
- Treat all information received with sensitivity and with due regard to confidentiality and its limits in child protection Safeguarding matters.
- Respect and promote the rights, wishes and feelings of young people and be sensitive to their developmental needs and capabilities.
- Be aware that the college will maintain appropriate internet filtering which blocks harmful and inappropriate content and, where this is unreasonably impacting teaching and learning, request release of the content. Safeguarding and IT leads work together to review effectiveness and respond to identified concerns.
- Recognise that the college will ensure appropriate information security and access management arrangements are in place to protect children and young people and their personal data from unauthorised access, misuse or cyber threats.
- Regard all young people as having an equal right to protection, irrespective of age, ethnicity, culture, disability, gender, language, religious belief, or sexual identity, taking positive action, where proportionate, to deal with the disadvantages these pupils face.
- Recognise that students who are questioning their gender may, in some cases, be at greater risk of harm. Staff should be alert to the potential for bullying, discrimination, abuse, exploitation, online harms, self-harm and poor mental health.
- Any support provided to those who are questioning their gender will be informed by safeguarding considerations, the wishes and feelings of the student, parental involvement as the leading role as appropriate, and relevant statutory guidance. Decisions will be made on a case-by-case basis, with the student's welfare as the paramount consideration.
- Recognise and make provision for the protection of the rights of biological sex whilst balancing the needs of gender questioning students.
- Recognise the safeguarding risks associated with artificial intelligence (AI) and emerging technologies, including AI-generated and enabled intimate images and videos (deep fakes), impersonation, cyberbullying, online exploitation, misinformation and technology-facilitated abuse including covert filming through smart glasses. Staff should remain vigilant to these risks and report concerns to the DSL or DDSLs.
- Recognise that children and young people are capable of abusing each other (child-on-child abuse) and that such abuse can occur both inside and outside of education settings, including online. Child-on-child abuse may include, but is not limited to, bullying, physical abuse, sexual harassment, sexual violence, harmful sexual behaviour, abuse within intimate personal relationships, coercive or controlling behaviour, initiation or hazing-type violence, and the sharing of nude or semi-nude images. The College adopts a zero-tolerance approach to such abuse and will take all reports seriously, ensuring that victims are supported, concerns are investigated appropriately, and action is taken to safeguard all children and young people involved. Staff should be vigilant to signs of child-on-child abuse and report concerns immediately.
- Be vigilant to the potential of a perpetrator also being a victim and the implications of this with child-on-child abuse.

- Be alert to indicators of serious violence, weapon carrying, gang involvement and exploitation (sexual and criminal), including county lines, and report concerns immediately to the Safeguarding team.
- Recognise misogyny as a potential safeguarding concern and a form of harmful behaviour that can contribute to sexual harassment, abuse, discrimination and violence. Throughout our work, promote respectful relationships, challenge harmful attitudes and behaviours, and respond appropriately to concerns involving misogynistic conduct both online and offline
- Regard the interests and safety of the young person to be the prime concern. Where there is a conflict of interest between the young person and parent or other adult, the welfare of the young person will be considered paramount.
- Avoid communicating with students via personal email accounts or personal social media and refrain from commenting on student posts using non-college accounts.
- Avoid posting identifying information or images which can be used by others to harm a young person. Be aware that the college takes steps to protect images and student identities used for promotional purposes online.
- Work in partnership with young people and their parents in the best interest of the child.
- Contribute to the provision of a safe environment by raising concerns where college premises and health and safety procedures appear to fall short of acceptable standards, particularly with regard to contextual safeguarding.
- Be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues, or recruitment processes using the Whistleblowing Policy if necessary.

Visitors and Contractors

All visitors to Cirencester College are required to sign in at the reception and are briefed on emergency procedures prior to being allowed on site.

Visitors and guest speakers will be identified by a red lanyard and will be accompanied all the time whilst on site. Where a visitor, practitioner or guest speaker is running a workshop or will be working with students with limited supervision, the visitor will provide a DBS (no older than 3 years) or update service number, they will then be identified as an authorised visitor with a green lanyard. Contractors who are conducting work on site during term-time contact hours, will be DBS checked and given a yellow contractor lanyard or supervised.
Volunteering in a role involving teaching, training, or supervising students frequently (more than 3 days in a 30-day period) or overnight is 'regulated activity', regardless of whether they are supervised, and as such will be required to complete a full DBS check.

Working remotely and on-line

Where it is necessary to teach or support young people through on-line communication tools such as MS Teams, staff should safeguard themselves and students by:

- Only using channels which are provided by the College where students are secured by their college email and/or login.
- Use of the camera facility is recommended so that students can see the staff member, however, staff should check that there are no personal information or artefacts visible in the background, particularly if this could identify their location. Blurring the background or using a background image is recommended. However, staff should ensure that students have turned off their cameras before the lesson starts so that others cannot see them.
- In 1:1 situation, from a safeguarding viewpoint, it is beneficial for both parties to have on their camera, however recording the video conference is advisable as a protection against potential allegations. The student should be made aware that recording is taking place.
- When combining face-to-face teaching with live streaming through MS Teams, staff should keep their camera/screen facing them and away from the class.
- Ensuring they select 'end meeting' not 'leave' which prevents the meeting from continuing when the organiser has hung up the call.

- Only contacting students within term-time college hours (08.00-18.00 Monday to Friday) to manage expectations and ensure that you have support from the safeguarding team should concerns emerge.

Staff should never, under any circumstances

- provide students with their personal phone number, email, or address.
- arrange to meet with students, even if in a public place or as a group, except on college site or on authorised college excursions.
- contact students on personal social media platforms. They must be aware of and decline invitations via Snapchat, Instagram, Facebook, or any other social network from students.

Data Protection

When managing a student's personal data information, it will be collected in accordance with the College's data protection policy and legislation relating to General Data Protection Regulations. Data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of information relating to this policy. Inappropriate access or disclosure of student data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the College's disciplinary procedure.

Equality

As with all College Policies and Procedures due care has been taken to ensure that this policy is appropriate to all students regardless of gender, age, race, ethnicity, disability, gender identity, sexual orientation, or religion/faith. The policy will be applied fairly and consistently whilst upholding the College's commitment to providing equality to all.

Related documents and policies:

Recruitment Policy and procedures
Prevent Duty Risk Assessment
Staff Code of Conduct
Employability, Work Experience, and Industrial Placement Policy
Health and Safety Policy
Allergy Safety Policy
Fitness to Study Policy
Digital Media Policy
Data Protection Policy