



CCG Safeguarding Students, Apprentices, Higher Education and Adults at Risk

(Child Protection, Online Safety and Prevent)

Introduction

Chichester College Group (the Group) is committed to protecting all our students, apprentices and adults at risk. The fundamental principles of this policy are based on legislation and also a moral duty to safeguard the welfare of students, apprentices and adults at risk receiving education, training and care at the Group, including off-site students/adults at risk, those on placement/apprenticeship, excursions or trips. This policy primarily deals with the protection of students and adults at risk. Any updates will be embedded and disseminated appropriately

Through this policy the Group aims to:

- Minimise the risks to health and well-being of students, apprentices and adults at risk
- Promote safe practices and challenge poor and unsafe practice
- Identify instances in which there are grounds for concern about the welfare of students and adults at risk and take action to keep them safe
- Enable students, apprentices and adults at risk to raise concerns relating to safety and for those concerns to be actioned
- Take appropriate action to prevent unsuitable people working with our students and adults at risk
- Ensure staff receive adequate training and supervision in relation to Child Protection, Safeguarding, Online Safety and Prevent

In pursuit of these aims, the Group Leadership Team (GLT) will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare and the promotion of a safe environment for the students and adults at risk
- Aiding the identification of students and adults at risk of significant harm and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against a member of staff

Safeguarding students, apprentices and adults at risk covers more than Child Protection. Issues including Child Sexual Exploitation (CSE), child on child abuse, health and safety, online safety (including disinformation, misinformation, and conspiracy theories as emerging risks) filtering and monitoring on college devices and networks, radicalised behaviour, Young Carers, mental health, and wellbeing, dealing with bullying, sexual harassment (see Annex 3), arrangements to meet the needs of students with medical conditions, providing first aid and other such requirements, must be considered when working with students. There are separate policies which must be read in conjunction with this policy (Scope of policy)



Scope of this policy

This policy applies primarily to students, apprentices and adults at risk (those under the age of 18 in our care or 25 if considered at risk; for example, students with disabilities and/or learning disabilities and those with mental health concerns) and applies, with appropriate adaptations, to allegations of abuse and the protection of adults at risk.

All staff, volunteers, agency staff and Governors must read and understand Part One of Keeping Children Safe in Education (KCSIE) 2026. CCG will maintain records to evidence that all staff have read and understood Part One and have received appropriate safeguarding updates.

The safer recruitment aspects of this policy relate to all staff, volunteers and Agency workers. Procedures are also in place with sub-contractors, partners and host families.

This policy should be read in conjunction with the following:

- Personal Relationships Policy
- Health & Safety Policy
- Care, Support and Medicines Policy
- Drugs, Alcohol & Substance Misuse and Possession of Weapons Policy
- Recruitment and Selection Policy
- Grievance (inc. Bullying & Harassment) Policy
- The Staff Code of Conduct and the 'Professional boundaries for staff' accompanying guidance
- CCTV Policy
- Acceptable Use Policy
- Digital Strategy
- Freedom of Speech and Guest Speaker Policy
- Data Protection Policy
- Whistleblowing Policy
- Positive Behaviour Management Policy
- Sexual Misconduct Policy
- First Steps Childcare Child Protection Policy

Policy changes will be disseminated via the Group's Management Teams.

This policy will be used objectively and free from discrimination, in accordance with the Group's Equity, Diversity and Inclusion Policy, the Recruitment and Selection Policy and the Disciplinary Policy and Procedure.



Statutory Responsibilities and Legislative Framework

CCG is committed to safeguarding and promoting the welfare of children, young people and adults at risk. Safeguarding is everyone's responsibility, and CCG will ensure its safeguarding arrangements comply with relevant legislation and statutory guidance.

Online Safety, Filtering and Monitoring

CCG recognises that technology is a significant factor in many safeguarding and wellbeing issues. The Group will take reasonable steps to protect learners online by maintaining appropriate filtering and monitoring systems across its devices, systems and networks.

The effectiveness of these arrangements will be reviewed at least annually and following any significant changes to the Group's digital infrastructure or safeguarding risk profile. Outcomes will be reported to senior leaders and governors to provide assurance that technology-related safeguarding risks are effectively identified, managed and mitigated.

Governors and senior leaders will maintain strategic oversight of online safety, filtering and monitoring arrangements, ensuring that safeguarding, cyber security and data protection considerations are appropriately addressed. Designated Safeguarding Leads will work with IT and leadership teams to support the effectiveness of these arrangements

CCG's safeguarding arrangements are informed by, and operated in accordance with, the following legislation and guidance:

Children Act 1989 and Children Act 2004

These Acts provide the legislative framework for safeguarding and promoting the welfare of children and place a duty on organisations to work together to protect children from harm. The welfare of the child is paramount in all safeguarding decisions.

Children and Families Act 2014 - This Act strengthens arrangements to improve outcomes for children and young people, including those with special educational needs and disabilities (SEND).

Education Act 2002 - This Act requires governing bodies and colleges to make arrangements to safeguard and promote the welfare of children and learners.

Sexual Offences Act 2003 - The Act makes it an offence for a person aged 18 or over in a position of trust to engage in sexual activity with a child under the age of 18 where a position of trust exists, even where the relationship is considered consensual.



Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015) - Section 5B places a mandatory duty on regulated health and social care professionals and teachers in England and Wales to report known cases of Female Genital Mutilation (FGM) in girls under the age of 18 to the police.

Safeguarding Vulnerable Groups Act 2006 - This Act establishes the legal framework for vetting and barring individuals who work with children and vulnerable adults and helps prevent unsuitable people from working with these groups.

Equality Act 2010 - CCG recognises its duties under the Equality Act 2010 and understands that some children and young people may face additional barriers to learning, support and reporting concerns due to protected characteristics. Staff will take appropriate action to reduce disadvantage, promote inclusion and consider the safeguarding implications of discrimination, prejudice and inequality.

Protection of Freedoms Act 2012 - This Act amended arrangements relating to regulated activity, Disclosure and Barring Service (DBS) checks and barred list checks. CCG will ensure that safer recruitment and vetting practices are undertaken in accordance with current legislation and statutory guidance.

Counter-Terrorism and Security Act 2015 - Under Section 26 of this Act, CCG has a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

Human Rights Act 1998 - CCG will ensure that safeguarding decisions are made with due regard to the rights, freedoms and welfare of children, young people and adults at risk.

Working Together to Safeguard Children 2026 - This statutory guidance sets out how organisations and agencies should work together to safeguard and promote the welfare of children through effective multi-agency working. Where appropriate, CCG will work with safeguarding partners and Family Help services to ensure children and families receive support at the earliest opportunity.

Keeping Children Safe in Education 2026 - CCG will have regard to Keeping Children Safe in Education (KCSIE) 2026 and will ensure that safeguarding policies, procedures, training and practice reflect the requirements of this statutory guidance. This includes arrangements relating to:

- child-on-child abuse
- harmful sexual behaviour
- sexual harassment and sexual violence
- online safety



- filtering and monitoring systems
- safeguarding risks associated with artificial intelligence (AI), deepfakes and emerging technologies
- children missing education
- mental health and wellbeing
- safer recruitment and allegations management

CCG will also take account of guidance issued by the Department for Education (DfE), the Disclosure and Barring Service (DBS), the Department for Education (DfE) local safeguarding partners and other relevant safeguarding bodies.

Reporting and Notification Requirements - Where required, CCG will notify the Department of Education (DfE) of significant safeguarding incidents, including:

- referrals relating to allegations of sexual violence made to children's social care, adult social care and/or the police
- allegations of abuse made against a lecturer or other member of staff that have been referred to the Local Authority Designated Officer (LADO) or relevant safeguarding authority.

Notifications will not include personal information about victims or alleged perpetrators and will be made in accordance with DfE requirements and funding agreement conditions.

Safeguarding Definitions and Terminology

In respect of this policy, the Group recognises that safeguarding encompasses a wide range of concerns that may affect children, young people and adults at risk. The following definitions are provided to support understanding of key safeguarding terms and categories of abuse.

Bullying: Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power

Physical abuse: Physical abuse causes harm. It 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. Physical abuse can also be when a parent, guardian or carer fabricates symptoms or induces illness in a student

Neglect: Neglect is the persistent or severe failure to meet a student's or adult at risk's basic physical and/or psychological needs. It will result in serious impairment of the student's and/or adults at risk's health or development



Sexual abuse: Sexual abuse involves a student or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the student or adult at risk to be aware that the activity is sexual and the apparent consent of the student or adult at risk is irrelevant. It also relates to sexual abuse in terms of e-safety and child sexual exploitation, such as inappropriate images, film and evidence of grooming

Non-contact abuse: Non-contact abuse is when abusive acts do not involve actual physical contact, i.e., pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present

Emotional abuse: Emotional abuse occurs when there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the student or adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse

Financial abuse: Financial abuse is the misuse of a person's funds and assets; obtaining property and funds without his/her knowledge and full consent, or in the case of an elderly person who is not competent, not in his/her best interests. This is also known as material abuse. Financial or material abuse can involve the theft or misuse of a person's money or property

Radicalisation and extremism: Radicalisation refer to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs

Terrorism: Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for advancing a political, religious or ideological cause

Discriminatory abuse: Discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include:

- disability - physical or learning disability, mental, ill-health or sensory impairment
- race
- gender
- age
- religion
- cultural background
- sexual orientation
- political convictions
- appearance

Grooming: Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional



Child Sexual Exploitation (CSE) and Child Crime Exploitation (CCE): Both Child Sexual Exploitation and Child Crime Exploitation are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Individuals or groups, male or females, children or adults can carry out this abuse. It can be a one-off occurrence or over a long period. County Lines - Criminal exploitation is a geographically widespread form of harm, that is a typical feature of County Lines criminal activity; drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas.

Cyber-bullying: Cyber-bullying is bullying that takes place over digital devices like mobile phones, computers, and tablets. Cyber-bullying can occur through SMS, text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyber-bullying crosses the line into unlawful or criminal behaviour

Forced Marriage: Forced marriage is where one or both people do not consent to the marriage and pressure, or abuse is used. Pressure can include threats, physical or sexual violence, and financial pressure. All child marriages are forced, because a child cannot provide informed consent, and is therefore a violation of children's rights

Female Genital Mutilation (FGM): Female Genital Mutilation (FGM) is a human rights violation, torture and an extreme form of violence and discrimination against girls and women. It is most often carried out on girls between infancy and age 15, though adult women are occasionally subjected

Significant Harm: Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children

Child on Child Sexual Violence and Sexual Harassment: further guidance has been published in the sexual violence and sexual harassment between children in schools and colleges (May 2018). The referral process is as per any safeguarding concern, but the Group must act swiftly and ensure a risk assessment is carried out. The risk assessment must consider:

- The victim
- The alleged perpetrator
- All other children and, if appropriate, other adults, children and staff

Children Missing in Education: Children missing in education is often an indicator for other potential safeguarding concerns. The Group should have measures, though its attendance reporting and follow up procedures, to ensure it is following up on students, who could potentially be "missing in education". This can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation



Domestic Abuse: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The Police are committed to tackling crime and disorder and supporting public protection across Sussex and work on a regular basis with education establishments. The Group is signed up to this initiative, which is called Operation Encompass. It is a joint-agency process which provides early intervention, appropriate support for students and adults at risk who have been involved in or exposed to domestic abuse. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. The impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships

Child on Child Abuse: can take various forms and may occur both inside and outside school, online and offline. It is most likely to include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- abuse within intimate personal relationships;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour (HSB);
- sexist, misogynistic or prejudicial behaviour;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- upskirting, image-based abuse and other forms of technology-facilitated abuse;
- initiation/hazing type violence and rituals.

CCG recognises that child-on-child abuse may be motivated by sexism, misogyny, prejudice or discrimination, and that harmful sexual behaviour, sexual harassment and sexual violence exist on a continuum. All concerns will be taken seriously, recorded, investigated appropriately and responded to in accordance with Part Five of Keeping Children Safe in Education 2026.

Violence Against Women and Girls (VAWG)

CCG recognises that violence against women and girls (VAWG) is a safeguarding issue that can affect children and young people directly and indirectly. Violence against women and girls encompasses a range of behaviours including sexual harassment, sexual violence, domestic abuse, stalking, so-called honour-based abuse, forced marriage, female genital mutilation (FGM), image-based abuse and other forms of technology-facilitated violence.

CCG recognises that misogyny, sexism, harmful gender stereotypes and discriminatory attitudes can contribute to abusive behaviour and create environments in which abuse is normalised. Staff should be alert to indicators of gender-based violence and take all concerns seriously.



Through curriculum activity, staff training, pastoral support and safeguarding procedures, CCG will promote respectful relationships, challenge harmful attitudes and behaviours, and respond appropriately to concerns relating to violence against women and girls.

Upskirting: The Voyeurism (Offences) Act 2019, commonly known as the Upskirting Act, came into force in England and Wales on 12 April 2019. Upskirting is the act of operating equipment (such as a camera or mobile phone) beneath a person's clothing, or recording an image beneath their clothing, without their consent or a reasonable belief in their consent, in order to view their genitals, buttocks or underwear where these would not otherwise be visible. The offence is committed where the purpose is to obtain sexual gratification or to humiliate, alarm or distress the victim

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity

Fabricated or Induced Illness: (FII) is a form of abuse associated with a range of poor outcomes for children and young people extending to the serious harm or even death of the child. Behaviours by a parent or carer may result in harm to a child or young person. FII can occur when a child or young person also has a confirmed diagnosis of illness or disability and the two may coexist, but the health seeking behaviour or presentation is outside that expected for the condition or disability." - NHS

Honour based abuse: This can be a form of abuse that may be linked to certain practices that are related to culture, faith, beliefs, and that may put young people at the risk of abuse

Serious Violence: There are indicators, which may signal that a child is at risk from or 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, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measure in place to manage these. Advice is provided in the Home Office's Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance

Mental Health and Wellbeing: Mental health concerns can, in some circumstances, be an indicator that a child, young person or adult at risk has experienced, or is at risk of, abuse, neglect, exploitation or other adverse experiences. Whilst mental health concerns are not, in themselves, always a safeguarding matter, staff should be aware that issues such as self-harm, suicidal ideation, suicide risk, eating disorders and other significant mental health difficulties may require safeguarding intervention. Where there is a risk of harm, concerns must be reported and managed in accordance with the Group's safeguarding procedures.



Responding to Safeguarding Concerns and Disclosures

Where a student, apprentice or adult at risk makes a disclosure of abuse, neglect, exploitation or harm, or where a member of staff has reason to suspect abuse, they must:

Allow the individual to speak without interruption

- Never trivialise or exaggerate the issue
- Never make suggestions
- Not coach or lead in any way
- Reassure the individual and let them know they were right to report the matter
- Always ask enough questions to clarify understanding but not probe or interrogate
- Be honest - the staff member should let the individual know that it cannot be kept a secret and someone else will need to be told.
- Try to remain calm, remembering that this is not an easy thing for them to do
- Not show emotions - to show anger, disgust or disbelief may stop the individual talking. This may be because the individual feels they are upsetting the staff member or feel the staff member's negative feelings are directed towards them
- Let the individual know they are taking the matter very seriously.
- Make them feel secure and safe without causing them any further anxiety
- Make a written record as soon as it is practically possible of what has happened
- If the member of staff believes the concern needs immediate attention, they should contact the duty Safeguarding Officer

Recording and Referring a Safeguarding Concern

- All safeguarding concerns and referrals must be submitted through the online safeguarding reporting system.
- Non-urgent concerns must be recorded on the online safeguarding reporting system as soon as possible to ensure they are appropriately logged and reviewed.
- Records must be factual, accurate, and objective. Staff must not include personal opinions, assumptions, or analysis. Phrases such as "I think..." or "In my opinion..." must be avoided.
- Where support or guidance is required, staff should seek advice from the Safeguarding Team.
- The Employee Assistance Programme (EAP) is available to provide wellbeing support to staff where required.

The Designated Safeguarding Officers:

- Will know how to make appropriate safeguarding referrals and escalate concerns to the Designated Safeguarding Lead (DSL) where required.
- Will provide advice and support to staff on safeguarding, child protection, online safety, and Prevent-related matters.
- Will be available to listen to and support students and adults at risk and ensure concerns are managed in line with safeguarding procedures.
- Will support the management of safeguarding cases, including contributing to multi-agency meetings, case conferences, and review meetings where appropriate.
- Will undertake safeguarding and child protection training relevant to their role and receive regular updates to maintain their knowledge and skills.



In the event the Designated Safeguarding Officers are unavailable, the Director of Safeguarding or Executive Principal should be contacted

All staff and governors are responsible for complying with this policy, reporting incidents and co-operating with any investigations or incidents in line with procedures

There is a Safeguarding Officer rota at all sites; to contact the on-duty Officer at:

Chichester:

Staff: extension 5555

Students: 01243-786321 ext 5555

Staff & students:
StaySafe@chichester.ac.uk

Crawley:

Staff: extension 2275

Students: 01293-442275

Staff & students: safe@crawley.ac.uk

Worthing:

Staff: extension 400

Students: 01903-275755 ext 400

Staff & students:
StaySafe@worthing.ac.uk

Haywards Heath:

Staff: extension 3900

Students 01444 711900 ext. 3900

Staff & Students:
StaySafeHaywards@chichester.ac.uk

Brinsbury:

Staff: extension 5555

Students: 01243-786321 ext. 1022

Staff and students:
StaySafeBrinsbury@chichester.ac.uk

Northbrook:

Staff: 07515 329089

Students and staff: 07515 329089

Students and staff:
staysafeNorthbrook@gbmc.ac.uk

Brighton MET:

Staff: 07739 615 265,
07980 973 224

Students and staff: 07739 615 265

Students and staff:
safeguardingmet@gbmc.ac.uk

Supervision of the Safeguarding Officers will be provided through the Group's Supervisory Counsellor or via an external provider.



A Safeguarding and Prevent Board meets termly to oversee the wider responsibilities of the Safeguarding Policy and Procedure, review statutory guidance and 'live' cases; where appropriate, a case review will be undertaken to learn and share practice.

The aim of the Safeguarding and Prevent Board is to:

- Ensure the Group provides the highest quality care for all students, with enhanced arrangements, and adults at risk
- Minimise the risk of harm to our students and adults at risk
- Address concerns about the welfare of our students and adults at risk
- Identify and respond to students and adults at risk who may be suffering significant harm and take appropriate actions
- Meet its legal requirements relating to safeguarding issues

The Safeguarding Teams meet weekly to discuss relevant cases and share practice at each campus. Where appropriate, and where a potential risk of harm has been identified, they will create and implement safeguarding safety plans and risk assessments, making reasonable adjustments, as appropriate to enable students and adults at risk to access learning opportunities; this will be in liaison with identified members of the Curriculum and support teams.

Further to this there is a formalised meeting structure:

- Regular meetings with the Safeguarding teams to formally discuss the safety of individuals as a serious case review on each site
- Two meetings per half term with the Director of Safeguarding and the Safeguarding Managers to review organisational safeguarding and prevent and consider serious cases
- Termly safeguarding and prevent updates to the Group Leadership Team and Governors
- Termly safeguarding and prevent risk assessment updates with risk register review
- Termly CCG safeguarding reports presented at the Safeguarding and Prevent Board
- Half termly meeting between the Safeguarding Governor and Safeguarding Director to ensure there are effective systems in place and to discuss any strategic issues/concerns
- Monthly meetings between Safeguarding Manager, Pastoral Support Manager and SEND Manager to share information relating to students at risk, and any issues/concerns
- Monthly meetings between Safeguarding Manager and Apprenticeship Manager to share information relating to students at risk and any concerns/issues relating to the workplace and/or college
- Monthly meetings between Safeguarding Manager and Teaching & Learning Managers to share information relating to students at risk and any issues/concerns
- Weekly meetings between Safeguarding Manager and Principal to discuss serious issues/concerns
- Bi-weekly meetings with Safeguarding Director and HR Director to review and monitor staff low level concerns and allegations



Procedure for dealing with 14-16 students

The College has a statutory duty to safeguard and promote the welfare of all children under the age of 18. For students aged 14-16 attending the College through a school or local authority arrangement, safeguarding is a shared responsibility between the College, the referring school and relevant external agencies.

All staff must act immediately in accordance with College safeguarding procedures if a concern arises or a disclosure is made. Concerns must be reported without delay to the Designated Safeguarding Lead (DSL), who will liaise as appropriate with the referring school, local authority, children's social care and other relevant agencies to ensure a coordinated and child-centred response.

Children in care, previously looked-after children, children with a social worker, care leavers and students with special educational needs and disabilities (SEND) may require additional support and protection. These learners are supported through the College's safeguarding arrangements, including designated staff with responsibility for children in care and care leavers, the safeguarding team and wider student support services.

Prevent

CCG is committed to safeguarding and promoting the welfare of all students and apprentices. The College Group supports students to develop the skills, knowledge and resilience to keep themselves and others safe, including online; while promoting respect, inclusion, tolerance, critical thinking and lawful freedom of expression.

The College Group fulfils its responsibilities under the Counter-Terrorism and Security Act 2015 Prevent Duty and is guided by the Government's CONTEST strategy, comprising the four strands: Prevent, Pursue, Protect and Prepare. Prevent aims to safeguard individuals who may be vulnerable to radicalisation or being drawn into terrorism.

Concerns relating to radicalisation, extremism, terrorism or vulnerability to being drawn into terrorism must be reported promptly to a member of the safeguarding team. The Designated Safeguarding Lead (DSL), or an appropriately trained deputy, will assess the concern and, where necessary, work with local authority Prevent teams, the police, Children's Social Care, Channel panels and other relevant agencies.

All staff, governors, and volunteers are required to complete safeguarding and Prevent training appropriate to their role and will be supported by the safeguarding team when concerns arise.



The College Group's Prevent risk assessment, action plan, training compliance and Prevent-related safeguarding activity are reviewed through the Safeguarding Board and reported regularly to the group leadership team and governors.

Allegations against staff and External Providers

The primary concern of the Group is to ensure the safety and wellbeing of its students, apprentices, and adults at risk. In line with KCSIE 2025, safeguarding responsibilities extend to any individual working with children on college premises, including those from external organisations using the site for non-college activities.

In all cases of suspected abuse or misconduct by a member of staff, supply staff, volunteer, contractor, or external provider, action must be taken promptly and professionally, regardless of the perceived validity of the concern. It is essential to emphasise that suspension is a neutral act and does not imply guilt.

If any member of staff has concerns that another individual—whether employed directly by the college or operating under a subcontract or external arrangement—is abusing or posing a risk to a student or adult at risk, they have a statutory duty to report these concerns immediately to the Director of Safeguarding or Safeguarding Managers, except where they themselves are the suspect. The Director of HR must be informed. The Director of Safeguarding will inform the LADO within 24 hours of a concern/allegation being raised and will agree a course of action with them.

All allegations of this nature will be investigated thoroughly. The investigation will be carried out promptly and within the principles of fairness and consistency.

If the allegation concerns the CEO, Executive Principal or Director of Safeguarding, the matter should be referred to the Designated Governor who will discuss it with the Chair of Governors, in addition to following the normal procedure for safeguarding. Additionally, staff can contact the LADO directly via the contacts numbers:

West Sussex 0330 022 26450 LADO@westsussex.gov.uk

East Sussex - to request a call email 0-19.SPOA@eastsussex.gov.uk or call the Single Point of access on 01323464222

Brighton and Hove 01273 290400 LADOenquiries@brighton-hove.gov.uk



Concerns about any members of staff can also be discussed with the Group's Director of Human Resources on 01243 537687.

Allegations which do not meet the harm threshold

All staff have a duty to report any concern, no matter how minor, about the behaviour of a colleague, contractor, volunteer, or any adult working with children, young people, or vulnerable adults. These are referred to as low-level concerns.

A low-level concern is any behaviour that may not meet the threshold for a formal allegation but nonetheless raises questions about an individual's conduct, professional boundaries, or suitability to work with children. Such concerns must be reported promptly to a member of the Safeguarding Team or to Human Resources, in line with the organisation's safeguarding procedures.

Low-level concerns may include, but are not limited to:

- Being overly familiar or favouring one student.
- Using inappropriate or unprofessional language.
- Having unnecessary or close physical contact with a student.
- Breaching professional boundaries or the Code of Conduct.

All allegations are reported and recorded, in a confidential record held by the HR team. Each allegation is reviewed, and appropriate actions agreed. The advice of the LADO may be sought as necessary.

Allegations about employers

Employers and their staff play a key and growing role in supporting and delivering education, training and assessment. Any cases of suspected abuse by an employer or their staff must be investigated quickly and professionally, whatever the validity. The Associate Principal Employers & Stakeholders has the right to pause engagement with an employer whilst an investigation takes place.

If a concern or allegation is made about an employer that indicates they may have behaved in a way that has harmed, or may have harmed, a student, or otherwise meet the harm threshold; the member of staff receiving the information must immediately report it to the Director of Safeguarding or a Safeguarding Manager. The Associate Principal Employers & Stakeholders must



also be informed. The Local Authority Designated Officer (LADO) must be notified within one working day of the concern or allegation being raised

Depending on the outcome of the investigation, the Associate Principal Employers & Stakeholders or has the authority to suspend or terminate employer contracts as well as blacklist the employer from future apprenticeships, placements of college engagement activities.

Designated staff with responsibility for Safeguarding

The Designated Lead for Safeguarding for the Group is the Executive Principal, in the absence of the Executive Principal, this role will be fulfilled by Director of Safeguarding. All college Principals will have responsibility for safeguarding for their college. Each college has a Safeguarding Manager affiliated to them who is the Deputy DSL.

The Group Leadership Team (GLT) has a key duty to take lead responsibility for raising staff awareness of issues relating to the welfare and the promotion of a safe environment for the students and adults at risk learning within the Group. GLT ensures all staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the Group's safeguarding procedures. It also ensures parents, guardians or carers of students and adults at risk at the Group are aware of the Group's Safeguarding Policy.

The Safeguarding Managers are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Liaising with the appropriate local authority, LADO and other appropriate agencies.
- Liaising with employers and training organisations -who receive students from the Group on long-term placements to ensure appropriate safeguards are put in place.
- Ensuring staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the Group's safeguarding procedures.
- Liaising with secondary schools to ensure that appropriate arrangements are made for pupils who may be at risk or who are subject to a CP or CIN plan.
- Ensuring the Group is represented at case conferences and review meetings as appropriate.

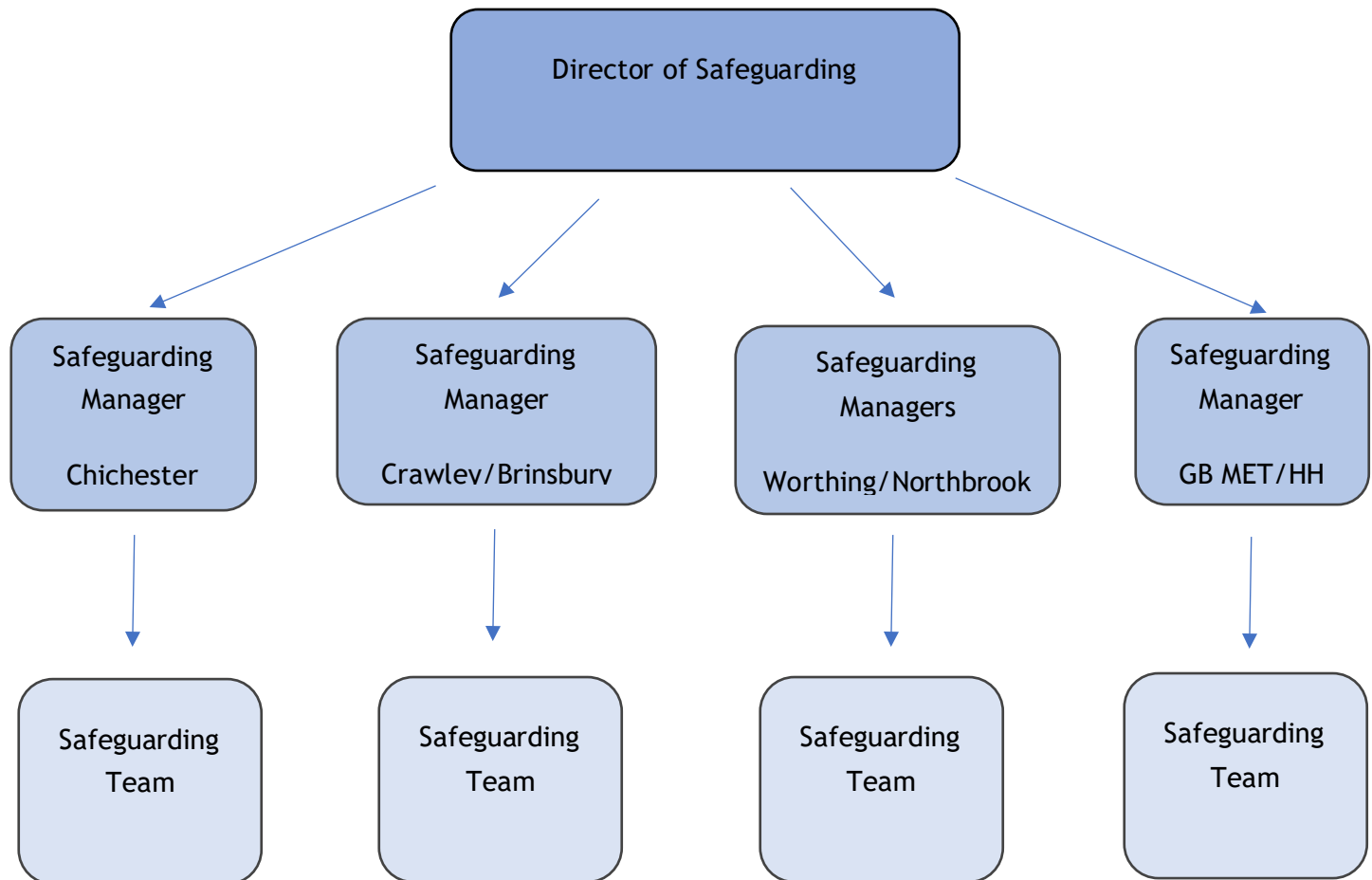


The Safeguarding and Prevent Board will provide an annual report to the Group's Governing Body setting out how the Group has discharged its duties (supported by contribution from the lead Governor for Safeguarding). They are responsible for reporting deficiencies in policy or procedure identified by the LADO, or others, to the Governing Body at the earliest opportunity. The Safeguarding Managers will ensure the consistent cross-college implementation of all safeguarding processes and procedures and to ensure appropriate quality standards are reviewed and monitored.

The Director of Information and Funding Information Services and team will make sure structures and processes are in place to ensure the Group holds appropriate levels of contact details for parents, guardians and carers of all students up to the age of 18 (or 25 for students with learning difficulties and/or disabilities). The role of the Safeguarding Managers is to work closely with strategic leads to provide oversight for the outcomes of these children and young people.



Designated Safeguarding Teams for CCG



Wider Safeguarding team:

- 14-16 Provision - Teaching & Learning Manager
- Gateway Provision - Teaching & Learning Manager
- Accommodation - Head of Accommodation
- Apprentices - Vice Principal for Apprentices
- Higher Education - Director of Higher Education



The safeguarding team receives regular safeguarding training and updates to maintain current knowledge and practice. Additional specialist training includes mental health, self-harm, suicide prevention, substance and alcohol misuse, attachment and trauma-informed practice, fabricated or induced illness (FII), early intervention, Prevent, exploitation, contextual safeguarding, domestic abuse, online safety, cyber safety, artificial intelligence (AI), misinformation and disinformation, equality, diversity and inclusion, SEND, and the safeguarding needs of vulnerable learners.

Designated Governor

There is a Designated Governor member of the Governing Body with responsibility for Child Protection, Safeguarding, e-Safety and Prevent implementation. All staff Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals.

The Designated Governor is responsible for liaising with the designated person with lead responsibility over matters regarding Child Protection, Safeguarding, e-Safety and Prevent, ensuring that:

- The Group has procedures and policies which are consistent with the LSCB procedure
- The Governing Body considers the Group policy on Child Protection, Safeguarding, e-Safety and Prevent each year
- Each year the Governing Body is informed of how the Group and its staff have complied with the policy including, but not limited to, a report on the training staff have undertaken

The Designated Governor is responsible for overseeing the liaison between agencies, such as the Police and Social Services, in connection with allegations against the GLT or the designated person. This will not involve undertaking any form of investigation but will ensure good communication between parties and provide information to assist enquiries.

To assist in these duties, the Designated Governor shall receive appropriate training. The Designated Governor is a member of the Safeguarding and Prevent Board

Training

The Designated Leads and Deputy Leads, as indicated in this policy, will have completed Level 3 Designated Safeguarding Lead training, provided by the local authority, refreshed every two years.

The Designated Safeguarding Officers and Designated Governor will have completed the recommended safeguarding training through the Local Authority.

All governors will receive appropriate safeguarding training at induction, and then at regular intervals. The training will provide them with the knowledge to ensure the college's safeguarding policies and procedures are effective.



All staff, including temporary, bank staff, agency workers and volunteers, who work with students, apprentices and/or adults at risk should undertake appropriate training to equip them to carry out their responsibilities effectively, and this is kept up to date by refresher training annually through online modules covering Safeguarding, Prevent and Online Safety, including expectations, roles and responsibilities related to filtering and monitoring online activities to ensure a secure online environment for students. Staff completion of online modules is reported to the Safeguarding and Prevent Board half-termly to ensure compliance.

All staff should receive regular updates through emails, e-bulletins and staff meetings to ensure staff are equipped with the latest skills and knowledge to safeguard children effectively

All staff should understand the significance of risks both online and offline, including child to child online abuse, disinformation, misinformation, and conspiracy theories and the use of generative Artificial Intelligence and its safeguarding implications (see Annex 5)

Safeguarding and Prevent are covered at both staff and student inductions as well as at other times during the year.

All HE staff will complete the recommended Home Office Prevent training.

Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned. The young person or vulnerable adult should be informed at the earliest possible stage of the disclosure the information will be passed on.

The College Group complies with the UK GDPR and the Data Protection Act 2018. Personal information may be shared where there is a lawful basis to do so, including where this is necessary to safeguard a child, young person or adult at risk. Data protection concerns must not prevent the timely sharing of information where there are safeguarding concerns

Safer recruitment

Safer recruitment is part of the Recruitment and Selection Policy. There is also a Disclosure and Barring Service Policy and a Recruitment of Ex-Offenders Policy.

In line with guidance in KCSIE, all pre-employment checks are carried out by the Human Resources Department. As part of these pre-employment checks, online searches are carried out on all new starters.

The Human Resources Department will maintain a single central register of all checks carried out on all staff and volunteers who will work with anyone within the scope of this policy.

In line with current Keeping Children Safe in Education (KCSIE) guidance, the College Group will only accept CVs alongside a completed application form. A CV on its own is not sufficient for safer recruitment purposes, as it may not provide the information required to identify gaps in employment, verify suitability, and support robust safeguarding checks



Communication

The policy is displayed on the Group's websites, staff intranet, the Virtual Learning Environment for students and apprentices and the Virtual Learning Environment for HE(CCG online).

Policy review area	HR, Students, Teaching, Learning & Quality, HE, Governance, Finance, H&S, Commercial and International, Information & Funding, IT, Information Management, Sales, Marketing & Comms, Estates & Facilities
Lead Manager/Owner	Eileen Darby
Approval level	Group Leadership Team/Corporation
Approval date	September 2026
Review cycle	Every year
Next review	September 2027



Annex 1 - Keeping Children Safe in Education (KCSiE) - Translations

It is the responsibility of everyone to keep children safe and to read all of Part One of the statutory guidance “Keeping Children Safe in Education”.

The London Grid for Learning (LGfL) have had KCSiE part one translated into a number of languages:

- Arabic
- Bengali
- Cantonese
- Gujarati
- Mandarin
- Polish
- Portuguese
- Punjabi
- Spanish
- Urdu

The translations can be downloaded here: <https://national.lgfl.net/DigiSafe/kcsietranslate>



Annex 2 - Definitions

Safeguarding is a term, which is broader than “child protection” and relates to the action taken to promote the welfare of children and young people and protect them from harm. Safeguarding is everyone’s responsibility.

Children and Young People - throughout the document, references are made to “children and young people”. These terms are interchangeable and refer to children to have not yet reached 18 or vulnerable adults up to the age of 25.

Staff - includes any adult who is employed, commissioned or contracted to work with children or young people, including volunteers, sub-contractors and guest speakers in either a paid or an unpaid capacity.

Designated Safeguarding Officers - a member of the wider Safeguarding Team trained to Level 3.

Duty of Care - the duty which rests upon an individual or organisation to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisations is responsible.

External Agencies - including Children’s Services, Independent Safeguarding Authority, West and East Sussex Safeguarding Board, Brighton and Hove Albion Safeguarding Board, Police, etc.

External Contractors - including building or maintenance contractors who are required to work at the Group for a given period.

Adult at Risk - someone who is over 18 who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or may be unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.



Annex 3 - Chichester College Group Approach to Addressing Sexual Harassment and Online Sexual Abuse

At Chichester College Group (CCG), sexual harassment and online sexual abuse are not tolerated. While there may be limited reported evidence of such incidents, we recognise that they can occur within any educational setting. Where concerns are identified, we will provide appropriate support and early intervention to protect individuals and groups within our community.

To achieve this, we will adopt the assumption that sexual harassment and online sexual abuse may be occurring within our colleges, even where there are no specific reports. We will therefore maintain a whole-college-group approach to preventing, identifying, and addressing these behaviours through our safeguarding policies, procedures, and practices.

We will work to:

- Minimise potential barriers to reporting and disclosing incidents of sexual harassment and sexual misconduct.
- Ensure that investigative procedures are fair, transparent, and independent.
- Ensure that all students involved receive appropriate support.
- Clearly set out behavioural expectations for all students.

Our CCG approach includes:

- Delivering a carefully sequenced Personal Development Programme (PDP), adapted as appropriate for Gateway provision, 14-16 full-time provision, apprentices, and Higher Education (HE) students. The programme is informed by the Department for Education's statutory guidance and includes education on sexual harassment and sexual violence, including online sexual abuse. Students will have opportunities to discuss topics such as consent, healthy relationships, and the sharing of nude and semi-nude images.
- Providing training and support for staff and host families who provide accommodation for students, to increase awareness of sexual harassment, sexual violence, and online sexual abuse.
- Delivering high-quality training for teachers and student support staff to increase awareness, strengthen confidence in identifying concerns and signposting support, and enable effective delivery of educational discussions and learning activities.
- Maintaining consistent use of Safeguard for the recording, monitoring, and analysis of incidents of sexual harassment and sexual violence, including online sexual abuse, in order to identify patterns, inform interventions, and prevent further harm.
- Reporting regularly on sexual harassment and sexual violence, including online sexual abuse, to the Safeguarding and Prevent Board and the Group Leadership Team (GLT), with an annual report to the Corporation and termly safeguarding updates provided to the Link Safeguarding Governor.



- Embedding a positive behaviour culture and using established referral processes to reinforce expectations that sexual harassment, sexual violence, and online sexual abuse are unacceptable and will not be tolerated.
- Working closely with external agencies to raise awareness and improve understanding of the support available to students, children and young people who have experienced sexual harassment or abuse, as well as those who display harmful sexual behaviour.
- Providing regular support, supervision, and professional development opportunities for the Safeguarding Officer Team.
- Delivering updated safeguarding training to ensure that all staff, and governors where appropriate, are able to:
- Understand the definitions and indicators of sexual harassment, sexual violence, and online sexual abuse.
- Recognise the early signs of child-on-child sexual abuse and harmful sexual behaviour.
- Respond consistently, appropriately, and effectively to incidents, disclosures, and concerns.
- Uphold a culture in which sexual harassment and online sexual abuse are challenged and addressed.



Annex 4 - Information on recognising abuse

What is neglect?

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

Signs of abuse

Poor appearance and hygiene

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter

Health and development problems

- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness or infections
- repeated accidental injuries, often caused by lack of supervision
- skin issues, such as sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues.

Housing and family issues

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members.



Changes in behaviour

- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- poor attendance
- showing signs of self-harm. Using drugs or alcohol

What is physical abuse?

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching. It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

Signs of abuse

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs.

If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning



What is sexual abuse?

When a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere - and it can happen in person or online. It's never a child's fault they were sexually abused - it's important to make sure children know this.

Types of sexual abuse

There are 2 types of sexual abuse - contact and non-contact abuse. And sexual abuse can happen in person or online.

Contact abuse is where an abuser makes physical contact with a child. This includes:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities
- making a child undress or touch someone else

Contact abuse can include touching, kissing and oral sex - sexual abuse isn't just penetrative. Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- exposing or flashing
- showing pornography
- exposing a child to sexual acts
- making them masturbate
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone

Emotional and behavioural signs:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary

Physical signs:

- Bruises.
- Bleeding, discharge, pains or soreness in their genital or anal area.
- Sexually transmitted infections.
- Pregnancy.



What is emotional abuse?

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child or young person. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or young person.

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Types of emotional abuse include:

- Humiliating or constantly criticising the child
- Threatening behaviour including shouting
- Using sarcasm or making the child the subject of jokes
- Blaming the child for situations
- Making a child perform degrading acts
- Pushing a child or trying to control their lives
- Exposing a child to events or situations such as domestic abuse or drug taking
- Not allowing a child to have friends
- Failing to promote a child's social development
- Making a child perform degrading acts
- Persistently ignoring a child
- Being absent
- Manipulating a child
- Being constantly negative about the child
- Never showing any emotion to a child

Signs of emotional abuse

With emotional abuse there may not be any obvious physical signs and a child may not tell anyone what is happening until they reach a crisis point. It is therefore important you look at how the child is acting and behaving. Signs may include:

- Unconfident or lacking in self-assurance
- Struggling to control their emotions
- Having difficulty in maintaining relationships
- Acting in a way that is inappropriate for their age
- Use of inappropriate language
- Being isolated from their parents
- Lacking social skills
- Have few or no friends



Annex 5 - Recognition of Technology in Safeguarding

Online safety is an integral part of safeguarding. Students may be exposed to risks online including abuse, exploitation, cyberbullying, grooming, radicalisation, misinformation, disinformation, fraud, harmful content and technology-facilitated abuse. CCG recognises the increasing risks posed by artificial intelligence, deepfakes, nudification tools and other emerging technologies and will take appropriate measures to educate, prevent, monitor and respond to such risks.

Risks from Generative Artificial Intelligence (AI): The rise of generative AI tools (e.g. ChatGPT, image generators, voice mimics) introduces new safeguarding challenges that colleges must address:

- Exposure to Harmful or Inappropriate Content
 - i. AI tools may generate or facilitate access to violent, sexual, or extremist material, especially if filtering systems are inadequate.
- AI-Enabled Abuse and Manipulation, children may use AI to create:
 - i. Fake messages or images to bully or impersonate peers.
 - ii. Deepfakes or misleading content that can damage reputations or cause emotional harm.

Children's personal data may be entered into AI systems that store or reuse it without proper safeguards, breaching UK GDPR and exposing them to profiling or exploitation.

- Misinformation and Over-Reliance
 - i. AI-generated content may mislead children or reduce their ability to think critically. Over-reliance can also affect learning outcomes and emotional wellbeing.

The effectiveness of filtering and monitoring systems will be formally reviewed at least annually. Findings and recommendations will be reported to senior leaders and Governors to ensure systems remain effective and proportionate in managing safeguarding risks.



Resources:

Each College has its own page on CCG online providing information for our students, Apprentices and Vulnerable Adults including links and signposting for internal and external support.

Support, advice and guidance is available on the Staff Intranet.

Remember Safeguarding is Everyone's responsibility.

If you have any concerns or are unsure you can speak to someone from the Safeguarding Team at your College

Please ensure you have completed your online module for Safeguarding and Prevent which will include reading all of Keeping Children Safe in Education Part 1 which applies to all staff, volunteers and Governors.