Document Title	Safeguarding Young People Policy 2026-2027									
Document Type	**Policy**	X	**Code**		**Procedure**			**Strategy**		
Approved by	**PMG**	X	**F&GP**	X	**Audit**		**Corporation**		X	
Date of final approval	October 2026			**Date for review**		October 2027				
Owner	Director of Safeguarding, Inclusion & Skills									

College Values

Students:	*as the focus for the work of everyone at the College*
Mutual Respect:	*caring for and valuing students, staff, governors and our community*
Integrity:	*honesty, hard work and personal and social responsibility*
Learning:	*a passion for learning and its capacity to change lives*
Excellence:	*high aspirations, high standards and high achievement*

1. Introduction and Scope

Luton Sixth Form College is committed to safeguarding and promoting the welfare of all students. This policy applies to every member of staff, governor, contractor, and volunteer, and to all students.

Safeguarding at Luton Sixth Form College means:

- **Providing help and support early** to meet students' needs before problems escalate.
- **Protecting students from maltreatment**, whether inside or outside the home, including online.
- **Preventing impairment** of students' mental or physical health or development.
- **Ensuring students grow up** in circumstances consistent with safe and effective care.
- **Taking action** to enable all students to have the best possible outcomes.

(*Adapted from Keeping Children Safe in Education 2026 and Working Together 2026.*)

1.1 Our Safeguarding Principles

- Every student has an equal right to protection from harm and abuse.
- Students must be **safe and feel safe** in college, on placement, and online.
- Students' **voices are central** – their wishes, feelings, and experiences shape decisions and support.
- The College promotes a **safe culture** where concerns are raised, heard and acted on swiftly.
- Safeguarding is **everyone's responsibility** – each adult working with or around students has a duty to report concerns.
- Everyone is expected to maintain professional curiosity and open-mindedness; to have the understanding that '*it could happen here*'.
- We adopt a **"Think Family, Think Context"** approach, recognising that harm can occur within families, peer groups, and communities.
- We take a **zero-tolerance** approach to sexual violence, harassment, discrimination or hate.

The college is committed to safeguarding every student and ensuring that no individual is treated less favourably because of age, disability, gender, gender reassignment, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

Safeguarding practice is guided by the principles of the Equality Act 2010 and the Public Sector Equality Duty, recognising some groups of young people may face additional barriers to safety and wellbeing.

The College actively promotes equality, diversity and inclusion through all aspects of its safeguarding work by:

- Identifying and addressing differential risks and vulnerabilities;
- Embedding culturally aware and trauma-informed practice;
- Ensuring that reasonable adjustments are made for students with SEND or mental-health needs.

1.2 Legal and Policy Framework

This policy reflects and complies with the following national and local documents:

- *Keeping Children Safe in Education (DFE 2025)(KCSiE 2026)*
- *Working Together to Safeguard Children (DFE 2026)*
- Crime and Policing Act 2026
- *Prevent Duty Guidance (2023)*
- *Information Sharing (HM Government 2024)*
- Data (Use and Access) Act 2025
- *Online Safety Act (2024)*
- *Education Act 2002 s.175 / s.157*
- *Domestic Abuse Act 2021*
- *Children and Families Act 2014*
- *Serious Crime Act 2015*
- *Equality Act 2010 and Human Rights Act 1998*
- *Data Protection Act 2018* and UK GDPR
- *Luton Safeguarding Children Partnership (LSCP)* procedures and *Effective Support Document*
- *Luton Safeguarding Adults Board (LSAB)* guidance

1.3 Scope of Safeguarding at Luton Sixth Form College

Safeguarding includes (but is not limited to):

- Neglect and self-neglect
- Physical, emotional and sexual abuse
- Child-on-child abuse and harmful sexual behaviour
- Bullying, including prejudice-based and online bullying
- Domestic abuse and family conflict
- Exploitation (criminal, sexual, or financial)
- Radicalisation and extremism
- Gender-based violence and misogyny
- Hate incidents and discriminatory harm
- Substance misuse and mental-health-related harm
- Homelessness, unregulated accommodation and contextual risk outside the home
- Online safety and emerging digital threats

1.4 Adult Safeguarding (Over 18s)

Some students are legally adults but may still be vulnerable. Where concerns relate to a student aged 18 or over, the College acts in accordance with the **Care Act 2014** and the procedures of the **Luton Safeguarding Adults Board (LSAB)**. Self-neglect, exploitation, or living in unsafe

conditions are treated as safeguarding matters, not solely welfare issues. Referrals will be made to **Adult Social Care** via the LSAB pathway where appropriate.

1.5 Local Safeguarding Governance and Key Contact

Role	Name / Title	Contact
Designated Safeguarding Lead	Altaf Hussain, Principal	01582 877500
Deputy Designated Safeguarding Lead	Claire Banks, Director of Safeguarding, Inclusion & Skills	CLB@lutonsfc.ac.uk 01582 432423
Safeguarding Officers	Jay Sahota, Head of Personal Development Behaviour & Attitude	We operate a 'Single Point of Entry' called CONTACT US for all safeguarding queries, click the link, use the QR code, or go to our CONTACT US page on the website. Concerns that are considered by professional judgement to be **immediate, serious and/or cause significant harm** must NOT be reported online but managed so as to have a member of the safeguarding team involved as soon as possible.
	Shaheen Abdouramane, Deputy Head of Safeguarding	
	Neil McNickle, Deputy Head of Behaviour	
	Pam Williams, Welfare Advisor (Safeguarding)	
	Edyta Sieklinski, Welfare Advisor (Mental Health)	
Designated Teacher for CLA	Shaheen Abdouramane, Deputy Head of Safeguarding	SWA@lutonsfc.ac.uk
Prevent Single Point of Contact	Claire Banks, Director of Safeguarding Inclusion & Skills	CLB@lutonsfc.ac.uk 01582 432423
Single Central Record Owner	Sayeda Meghjee, Director of Human Resources	SKM@lutonsfc.ac.uk
Safeguarding Governor	Patricia Griffin	Via Head of Governance LQB@lutonsfc.ac.uk 01582 877500
Data Protection Officer	Louise Barden, Head of Governance and Data Protection	dataprotectionlsf@lutonsfc.ac.uk
Local Authority Social Services	MASH Duty Desk Out of Hours	MASH@luton.gov.uk 01582 547653 0300 300 8123 Referral Form
LADO	Paul James	LADO@luton.gov.uk 01582 548069 Referral Form

Role	Name / Title	Contact
Non-emergency	Police	101
	Childline	www.childline.org.uk 0800 1111
	NSPCC	www.nspcc.org.uk 0808 800 5000 hello@NSPCC.org.uk
	Young Minds	www.youngminds.org.uk

1.6 Linked Policies and Documents

This policy should be read alongside the following:

- Recruitment and Selection of Staff Policy and Procedure
- Staff Code of Professional Conduct
- Student Behaviour and Learning Policy
- ICT Acceptable Use Policy
- Whistleblowing (PI Disclosure) Policy
- Data Protection Policy
- Visitors Policy
- Educational Visits Policy and Procedures
- Health and Safety Policy
- Prevent Risk Assessment and Action Plan

2 Roles and Responsibilities

Safeguarding is everyone's responsibility. Every member of staff, volunteer, contractor and governor has a duty to safeguard students and to act immediately on any concern.

This section defines the core safeguarding responsibilities within Luton Sixth Form College.

2.1 All Staff and Volunteers

All staff and volunteers will:

- **Know and follow** this Safeguarding Young People Policy and the staff Code of Professional Conduct.
- **Maintain professional curiosity**, noticing changes in appearance, mood, attendance or performance.
- **Record and report concerns promptly** using CONTACT US, including low-level concerns or patterns of behaviour.
- **Respond appropriately to a disclosure** using the steps in Appendix A.
- **Never promise confidentiality** and always inform a DSL or safeguarding officer immediately.
- **Recognise that abuse may occur online, between peers, or outside the home** ("contextual safeguarding").
- **Take part in regular training** and supervision so that practice remains current.
- **Model respectful behaviour** and contribute to a positive safeguarding culture.

Temporary, agency and supply staff will receive safeguarding induction before beginning work on site.

2.2 Teaching and Support Staff

In addition to the duties above, all teaching and support staff will:

- Use tutorial and curriculum opportunities to promote online safety, healthy relationships, inclusion and resilience.
- Identify early indicators of vulnerability (attendance, emotional distress, poor engagement) and liaise with the student's Attendance & Progress Coach and parents/carers.
- Contribute to Family / Early Help assessments or multi-agency plans as required.
- Challenge discriminatory, sexist or extremist language or behaviour immediately.

2.3 Attendance & Progress Coaches and Personal Tutors

Pastoral roles are central to early identification and support.
They will:

- Monitor attendance and engagement daily and follow up concerns.
- Escalate safeguarding indicators (e.g., attendance below 75%, prolonged non-response, or sudden withdrawal) to the safeguarding team.
- Keep a record of welfare checks and communications with parents/carers where appropriate.
- Reinforce safeguarding and online-safety messages in tutorials.

2.4 Designated Safeguarding Lead (DSL)

As Principal *Altaf Hussain* holds Designated Safeguarding Lead responsibility and strategic accountability for ensuring that the College fulfils its statutory duties under *Keeping Children Safe in Education (2026)* and maintains an effective culture of safeguarding. The operational leadership is delegated to the Deputy Designated Safeguarding Lead, who manages day-to-day safeguarding practice and decision-making.

The DSL will:

- Provide strategic leadership and governance oversight of all safeguarding and child protection activity.
- Ensure that the Safeguarding Young People Policy is implemented, reviewed annually and approved by governors.
- Delegate day-to-day management of safeguarding to the Deputy DSL while retaining ultimate accountability.
- Receive regular reports from the Deputy DSL and safeguarding team on casework, training and compliance.
- Ensure that safeguarding is embedded across the College's strategic plans, risk management and staff training structures.
- Report to the Governing Body and sign off the Section 175 audit on behalf of the College.
- Ensure robust safeguarding cover arrangements are maintained during periods when the DSL or DDSL are unavailable, including oversight of shared safeguarding reporting systems and escalation arrangements.

Further information regarding safeguarding continuity and cover arrangements is set out in Appendix D.

2.5 Deputy Designated Safeguarding Lead (DDSL)

Claire Banks, Director of Safeguarding, Inclusion & Skills**,** is the Deputy Designated Safeguarding Lead and operational lead for safeguarding, Prevent and student welfare/wellbeing.

The DDSL holds delegated responsibility for the day-to-day management of all safeguarding and child protection activity within the College and will:

- Oversee all casework, referrals, and liaison with MASH, Adult Social Care, the Police and other agencies.
- Lead multi-agency working, Family Help / Early Help coordination and internal case supervision.
- Chair safeguarding caseload reviews and ensure all decisions and rationales are recorded in CPOMS.
- Manage and support the safeguarding officers and welfare advisors.
- Lead the College's Prevent Duty work as the Single Point of Contact (SPOC) and maintain the Prevent Risk Assessment and Action Plan.
- Ensure CPOMS record-keeping and data protection standards are maintained.
- Co-ordinate staff training, briefings and supervision to maintain high professional standards.
- Analyse safeguarding data and emerging risks to inform reports for SLT, governors and the Section 175 audit.
- Triage and oversee low-level concerns jointly with the HR Director.
- Act as principal liaison with the Luton Safeguarding Children Partnership (LSCP) and Luton Safeguarding Adults Board (LSAB).

2.6 Safeguarding Officers

The Safeguarding Officers (*Jay Sahota, Shaheen Abdouramane, Neil McNickle, Pam Williams, Edyta Sieklinski*) will:

- Act as first points of contact for students and staff concerns.
- Undertake risk assessments and develop student support plans.
- Liaise with external agencies and parents as directed by the DDSL.
- Ensure accurate and timely CPOMS entries.
- Provide safeguarding briefings and student workshops on emerging themes.

2.7 Director of Human Resources

Sayeda Meghjee, Director of Human Resources, leads on Safer Recruitment and workforce safeguarding practice across the College.

The Director of Human Resources will:

- Maintain and quality-assure the Single Central Record (SCR) of all pre-employment checks in accordance with *KCSiE 2026* and College policy.
- Ensure that Safer Recruitment procedures are consistently applied to all appointments, including governors, contractors, volunteers, and agency staff.
- Oversee the recruitment and selection process, ensuring that:
    - At least one member of each selection panel has current Safer Recruitment training;
    - Job descriptions, adverts and interview questions make safeguarding responsibilities explicit;
    - References are verified, gaps in employment are explored, and identity checks are completed;

    - Qualifications, right-to-work, and professional registration checks are undertaken where required;
    - Enhanced DBS and barred list checks are completed before start dates unless exceptional risk-assessed circumstances apply;
    - Risk assessments are recorded for any delayed or positive DBS disclosures.
- Conduct online searches for shortlisted candidates (as permitted under *KCSiE 2026*) and record findings securely.
- Ensure contractors, agency staff and visiting professionals are subject to appropriate checks and maintain evidence of compliance from supply agencies.
- Lead on the management of allegations against staff, liaising with the LADO (*Paul James*) and the DDSL to ensure swift, fair and compliant processes.
- Maintain the low-level concerns log, supporting the DDSL to identify emerging patterns or cultural risks.
- Work collaboratively with the DDSL to ensure all staff are inducted into the College's safeguarding culture and Code of Professional Conduct before commencing employment.
- Provide termly SCR audits and compliance reports to the Principal and Safeguarding Governor.

2.8 Safeguarding Governor

The Safeguarding Governor (*Tasha Case*) will:

- Provide strategic oversight and assurance on safeguarding and Prevent.
- Meet termly with the DDSL to review training, referrals and audit actions.
- Report to the Governing Body on compliance and risk.
- Ensure governors have received regular safeguarding training.

2.9 Students

Students are encouraged to be active participants in safeguarding their community. They will:

- Know how to report concerns via the website referral form or QR code on college posters.
- Contribute to the development of a safe, inclusive and respectful environment.
- Engage with Life Lessons tutorials and online-safety activities.
- Seek help for themselves or others without fear of judgement.

2.10 Parents, Carers and External Partners

The College recognises that parents and carers play a vital role in safeguarding. Where appropriate, the College will:

- Communicate concerns openly and professionally unless doing so would place a student at greater risk.
- Offer support through Family / Early Help and referrals to services where consent is obtained.
- Work collaboratively with external partners including health, social care, police, and voluntary agencies to improve outcomes for students.

3 Safeguarding Culture, Thresholds and Procedures

3.1 A Safe College Culture

Luton Sixth Form College promotes a culture where safeguarding is everyone's business.
We expect all staff and students to create an environment that is safe for young people and unsafe for those who may pose a risk**.** The College maintains clear safeguarding cover arrangements during

periods of absence, leave or illness affecting the DSL or DDSL. Safeguarding concerns must continue to be monitored, reviewed and acted upon without delay.

Our culture is characterised by:

- **Openness and transparency** – staff raise concerns without fear of reprisal.
- **Professional curiosity** – staff ask questions and notice subtle changes in students' behaviour, appearance, or engagement.
- **Respect and equality** – all students are valued and differences celebrated.
- **Zero tolerance** for sexual harassment, abuse, or discriminatory behaviour.
- **Continuous learning** – safeguarding is discussed routinely in staff briefings, team meetings and supervision.

The College believes that effective safeguarding depends on the quality of relationships between students, staff and external partners. Every student should know who they can talk to and how to access help.

3.2 Recognising, Responding, Recording and Reporting to Concerns

All staff share responsibility for identifying and acting on signs of abuse, neglect or vulnerability. Safeguarding begins with professional curiosity and the mindset that **"it could happen here."** Abuse may be subtle, cumulative or occur online, and indicators might include changes in mood, behaviour, attendance, academic performance, appearance, or social interaction.

Staff are expected to follow the **Four R's**:

Recognise

- Stay alert to anything that causes concern — no matter how small or uncertain.
- Notice changes or patterns that may indicate harm, distress, or exploitation.
- Remember that some students, including those with SEND or mental-health needs, may communicate distress through behaviour rather than words.

Respond

- Take all disclosures and concerns seriously.
- Listen calmly, offer reassurance, and thank the student for speaking up.
- Avoid judgement, leading questions or promises of confidentiality.
- Explain what will happen next and that the concern will be shared to help keep them safe.

Record

- Make an accurate, factual record as soon as possible — using the student's own words where relevant.
- Record the date, time, location, people present**,** and what action was taken.
- Keep your record objective and free from personal opinion or speculation.

Report

- Upload your record to CONTACT US to alert a Safeguarding Officer
- If you believe a student is at immediate risk of harm**,** contact the Safeguarding Team directly or Police (999) without delay.

If the concern relates to a member of staff, follow the procedures in Appendix B: Managing Allegations and Low-Level Concerns**.**

All staff are reminded that safeguarding concerns must never be left unreported or assumed to be someone else's responsibility. It is always better to raise a concern that proves unfounded than to miss an opportunity to protect a young person.

For step-by-step guidance on handling a disclosure from a student, see Appendix A.

3.3 Recording and Case Management

- CONTACT US is the single point of entry for recording safeguarding concerns and disclosures to inform the safeguarding team and raise a case.
- Safeguarding concerns are reviewed as soon as possible and normally on the same working day.
- Concerns that are considered by professional judgement to be **immediate, serious and/or cause of significant harm** must NOT be reported online but managed so as to have a member of the safeguarding team involved as soon as possible.
- The College uses CPOMS (Child Protection Online Monitoring System) to record, track and manage safeguarding cases.
- Safeguarding Officers and the DDSL review new entries daily.
- Historical paper files (pre-2018) are stored securely and separately from academic records.
- If a student transfers to another provider, safeguarding records are sent securely to the DSL at the new setting within five working days.
- The DDSL undertakes regular caseload supervision with safeguarding officers to ensure consistency and quality of decision-making.

3.4 Thresholds, Family Help and Early ~~Help~~ Intervention

The College follows the *Luton Effective Support Document* to determine the level of need and appropriate intervention. This framework supports early identification of vulnerability and promotes help at the least intrusive level**.** The College recognises the community-based Family Help model introduced through Working Together to Safeguard Children and KCSIE 2026. Staff should be aware of referral pathways to targeted Family Help services, statutory section 17 support and local authority children's social care.

Level of Need	Examples	College Response
Universal	Student thriving, no additional concerns	Normal pastoral support, Life Lessons and pastoral contact
Targeted	Attendance dropping (<90%), anxiety, friendship issues, family stress, housing insecurity	Progress Coach/Tutor, Welfare Advisors work with student and parent/carer. Family / Early Help referral considered with consent
Targeted Plus	Sustained attendance below 75%, mental health deterioration, suspected exploitation, domestic abuse, contextual risk	Safeguarding Officers consult with MASH; Team Around the Family (TAF) or multi-agency meeting arranged
Significant Harm / High Risk / Specialist	Immediate danger, serious injury, sexual assault, suicidal crisis, missing student	Safeguarding Officers make urgent referral to MASH or Police; inform DDSL; parents informed unless this increases risk

3.5 Attendance as a Safeguarding Indicator

Although post-16 students are not covered by statutory school attendance legislation, attendance remains an important indicator of a student's wellbeing, engagement and potential vulnerability.

The College monitors attendance through electronic registers, Attendance & Progress Coaches and routine attendance reviews. Attendance information is considered alongside other safeguarding indicators and contextual information when assessing potential risk.

Where attendance concerns are identified, staff will respond in a graduated manner:

- Curriculum Staff and Attendance & Progress Coaches will undertake initial welfare checks and seek to understand any barriers to attendance.
- Where concerns persist, escalate or are accompanied by additional indicators of vulnerability, the matter will be referred to the Safeguarding Team for review and appropriate intervention.
- Where attendance patterns suggest a significant safeguarding concern, unexplained absence, heightened vulnerability, risk of harm, or a potential need for statutory intervention, the Safeguarding Team will consider referral or consultation with external agencies, including MASH, in line with the Effective Support Framework.

Safeguarding concerns may be raised and acted upon at any stage, regardless of attendance level, where a member of staff believes a student may be at risk of harm.

Where a student under the age of 18 withdraws from education unexpectedly, cannot be contacted, or their whereabouts cannot be established, the College will liaise with the Luton Children Missing Education (CME) Officer and/or MASH to ensure appropriate safeguarding oversight.

3.6 Information Sharing and Confidentiality

Safeguarding is built on timely and appropriate information sharing. The College follows *Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and their Practitioners (Sept 2026)*

Key principles:

- Information sharing is a legal duty, not a discretionary decision.
- Consent is not required where there is a lawful basis to share safeguarding information.
- Relevant information should be shared to support early help and safeguarding interventions.
- Responding to requests for safeguarding information from partner agencies is now part of the duty.
- The expectation is to share information unless doing so would be more harmful to the child than not sharing, which should be rare.
- Data protection legislation is not a barrier to appropriate safeguarding information sharing.

When sharing information with another educational setting, the College will ensure information is relevant, proportionate, clearly presented and appropriately contextualised to support effective risk assessment.

3.7 Escalation and Professional Challenge

Safeguarding is a shared responsibility, and effective professional challenge is a sign of healthy safeguarding culture. Staff are expected to raise questions and professionally challenge decisions where they believe a student may be left at risk of harm.

3.7.1 Internal Professional Challenge

If a member of staff disagrees with how a safeguarding concern has been handled within the College:

1. They should discuss the issue directly with the Safeguarding Officer or DDSL to clarify the rationale.
2. If the concern remains unresolved, it should be escalated to the DSL (Principal)**.**
3. If disagreement persists, staff may raise the matter with the Safeguarding Governor or through the Whistleblowing (Public Interest Disclosure) Policy**.**

The College values professional curiosity and will respond to challenge in an open and reflective way.

3.7.2 External Professional Challenge (Multi-Agency)

When the Safeguarding Officer leading the case, the DDSL, or DSL believes that the College's view of risk is not being adequately recognised or responded to by another agency (for example, MASH, Children's Social Care, or the Police):

1. The Safeguarding Officer will use Stage 1 of the *Luton Safeguarding Children Partnership Escalation and Resolution Policy* to discuss the concern with the relevant professional.
2. If agreement cannot be reached, the Safeguarding Officer will escalate to Stage 2 by raising the matter with the MASH Team Manager and inform the DDSL.
3. If necessary, the College will progress through Stages 3 and 4 in accordance with the LSCP procedure, ensuring that all communication and decisions are recorded on CPOMS.
4. At every stage, the College will remain focused on the student's safety and welfare, not on professional hierarchy.

The DDSL will review all escalation activity during termly safeguarding audits to ensure learning is captured and shared with the safeguarding team.

3.8 Support for Students and Staff

Safeguarding can be distressing work. The College ensures that:

- Students have access to Welfare Advisors, including therapeutic mental health support, and external helplines such as Childline (0800 1111)**,** NSPCC (0808 800 5000) and Young Minds.
- Staff involved in safeguarding cases receive supervision and wellbeing support**.** The College also provides staff with counselling services upon request.
- The DDSL and Safeguarding Officers participate in peer supervision and LSCP learning events.

4 Specific Safeguarding Concerns

Safeguarding concerns rarely exist in isolation. Students may experience more than one form of harm, and vulnerabilities often overlap. The following subsections summarise the main types of concern that may affect 16 to 19 year-olds and describe the College's approach.

4.1 Abuse

Abuse is a form of maltreatment that may occur in person, online, between peers, or from adults. It may be physical, emotional, sexual, or neglectful. All staff must be familiar with indicators, understand that abuse can be hidden, and act immediately on any concern.

Physical Abuse

Physical abuse involves causing physical harm to a student. It may also be caused when a parent, carer or another person fabricates symptoms or deliberately induces illness.

Possible indicators include:

- Unexplained injuries, bruises or burns inconsistent with explanation;
- Frequent "accidents" or repeated visits to first aid;
- Wearing long sleeves or multiple layers in warm weather;
- Fear of physical contact or flinching when approached;
- Aggressive, withdrawn or anxious behaviour.

Emotional Abuse

Emotional abuse involves persistent emotional maltreatment that impacts mental health and development. It may include humiliation, intimidation, isolation, controlling behaviour, or exposure to domestic abuse.

Possible indicators include:

- Excessive fear of making mistakes or being told off;
- Extreme compliance or "people-pleasing";
- Low self-esteem, depression or anxiety;
- Overly self-critical or self-blaming language;
- Difficulty sustaining relationships or trust;
- Sudden drop in motivation, engagement or concentration.

Sexual Abuse

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, whether or not the student is aware of what is happening. It includes non-contact abuse (such as grooming, exposure to pornography, sexting, or online image sharing) as well as contact offences.

Possible indicators include:

- Sexualised behaviour or knowledge inappropriate to age;
- Sudden change in dress or hygiene (e.g. avoidance of showers, baggy clothing);
- Self-harm, withdrawal or unexplained mood changes;
- Reluctance to go home or be alone with certain people;
- Possession of unexplained money, gifts or phone credit;
- Reports of being photographed, filmed or messaged inappropriately online.

4.2 Neglect and Self-Neglect

Neglect remains a key Luton Safeguarding Children Partnership (LSCP) priority and can also be relevant to the Luton Safeguarding Adults Board (LSAB) under the *Care Act 2014*.

Neglect is the persistent failure to meet a young person's basic physical or psychological needs, likely to result in harm. In a sixth-form context this may include:

- Consistent lateness or non-attendance with no parental engagement;
- Poor self-care, hygiene, nutrition or medical neglect;
- A lack of emotional warmth, boundaries or supervision;
- Unsafe or unstable living arrangements.

Self-neglect may include refusal of essential care, hoarding, or living in unsafe conditions. The College applies the LSCP Effective Support Document to judge threshold levels and will refer to MASH or Adult Social Care as appropriate.

Staff should:

1. Record indicators on CONTACT US and discuss promptly with a Safeguarding Officer;
2. Consider Family / Early Help where consent is gained;
3. Use professional curiosity to explore underlying causes.

The College supports the aims of the Pan-Bedfordshire Neglect Strategy (2024 – 2026)**,** including early identification through the *Graded Care Profile 2 (GCP2)* tool.

4.3 Child-on-Child Abuse

The College recognises that child-on-child abuse is a safeguarding issue for all students involved, including victims, alleged perpetrators and bystanders who may be affected. Students may harm other students physically, sexually, emotionally or online. This includes bullying, sexual harassment, coercive control, sharing of nude or explicit images, and abuse within relationships.

All incidents involving nude or semi-nude images, including AI-generated, synthetic or manipulated imagery, will receive a safeguarding response proportionate to the age, vulnerability and circumstances of the students involved.

Staff should remain alert to periods when risks may increase, including immediately before and after the college day. All allegations are taken seriously and investigated in line with the Student Behaviour and Learning Policy. No incident is ever dismissed as "banter" or "part of growing up." The College recognises that both the victim and the alleged perpetrator may be vulnerable and require safeguarding support.

Our approach:

- Victims are never made to feel at fault and are offered immediate emotional and practical support through Welfare Advisors or external services.
- Alleged perpetrators are also assessed for underlying harm or vulnerability, recognising that abusive behaviour may result from their own trauma, coercion, exploitation, or unmet needs.
- Safeguarding plans will address both parties' welfare, safety and education, with proportionate measures to protect others while avoiding unnecessary exclusion wherever possible.
- The College works with MASH, the Police and specialist agencies to ensure a balanced, trauma-informed response.

Preventive education about healthy relationships, consent, and respect is delivered through the Life Lessons curriculum and tutorial programme.

4.4 Exploitation

Exploitation takes many forms including **criminal**, **sexual**, and **financial** exploitation.

- **Criminal Exploitation (CCE):** county lines activity, transporting or storing drugs, debt bondage, or being threatened into illegal acts.
- **Sexual Exploitation (CSE):** coercion, manipulation or deception into sexual activity in exchange for money, gifts, accommodation or affection.
- **Financial Exploitation:** money-muling, online scams, or debt coercion linked to cost-of-living pressures.

The College recognises that older teenagers can appear to be making "choices" when in reality they are being controlled. Staff will alert the safeguarding team through CONTACT US, who will record suspicions on CPOMS and refer to MASH using the Effective Support thresholds.

4.5 Domestic Abuse, Family Conflict, and Intimate Relationships

Domestic abuse can involve physical violence, emotional manipulation, coercive control, sexual abuse or financial exploitation between adults or between young people in a romantic or intimate relationship.

Abuse may be digital (for example, persistent messaging, monitoring location, or threatening to share private images) as well as in person.

Witnessing or experiencing abuse of any kind can seriously affect a student's wellbeing, safety and capacity to learn.

Intimate relationships between students:

- The College recognises that many students form romantic relationships during their time here.
- Staff will remain alert to any indicators that a relationship has become unhealthy or abusive, such as jealousy, control, isolation from peers, humiliation, or emotional/sexual coercion.
- Where concerns arise, both individuals will be treated as potentially vulnerable and offered separate, confidential support.
- The College will assess safety and wellbeing for both parties, implement proportionate protective measures (for example, timetable adjustments or mediation through Welfare Advisors), and make referrals to MASH or specialist services if abuse or exploitation is suspected.
- Preventive education about healthy relationships, respect and consent is delivered through the Life Lessons curriculum and tutorials.

Support is available through the College's Welfare Advisors and external agencies such as **IDVA** through Bedfordshire Victim Support and **Relate**.
Where necessary, the Safeguarding Officers will liaise with Family / Early Help, MASH, or the Police to ensure the safety of everyone involved.

4.6 Gender-Based and Sexual Harassment and Violence

The College recognises harmful sexual behaviour as existing on a continuum ranging from inappropriate behaviour through to sexual harassment, sexual assault and sexual violence. Gender-based harassment and sexual violence are serious safeguarding issues that can affect students both on and off-site, including online. These behaviours may be experienced by any gender, and can involve power imbalance, coercion, humiliation or peer pressure.

Examples include:

- Unwanted sexual comments or advances;
- Sexualised "jokes" or imagery;
- Up-skirting, down-blousing or voyeurism;
- Non-consensual sharing of nude or semi-nude images;
- Coercive control within intimate relationships;
- Sexual assault or rape.

The College takes a zero-tolerance approach. All reports are treated seriously, investigated sensitively, and recorded on CPOMS. Where a potential criminal offence has occurred, the College will liaise promptly with MASH and the Police, following their lead on any criminal investigation.

Supporting all students involved:

- Victims are provided with a safe environment to disclose and are offered immediate safeguarding, welfare and academic support.
- The alleged perpetrator will also be offered support, recognising that they may themselves be a victim of trauma, coercion, exploitation or unhealthy peer norms.
- Each case is risk-assessed individually to determine appropriate protective measures, which may include timetable adjustments, supervision plans, or managed moves.
- Both students' voices are heard, and support is planned in consultation with relevant agencies.
- The College seeks to balance safeguarding and justice with education and rehabilitation, avoiding unnecessary exclusion where alternative support can maintain safety.

Preventive education about respect, consent, healthy relationships and equality is embedded within the Life Lessons curriculum and reinforced through campaigns, tutorials and staff training.

4.7 Radicalisation and Extremism

Luton Sixth Form College has statutory duties under the Prevent Duty (2015, updated 2023). Radicalisation refers to the process by which individuals are drawn into extremist ideologies or terrorism. These may include Islamist, far-right, incel, or conspiracy-based narratives spread online or through peer networks.
The Prevent Single Point of Contact (SPOC) is the DDSL (Claire Banks). Concerns are recorded on CPOMS and reviewed with the DSL. Where there is risk of radicalisation, a Prevent Referral Form is submitted to the Police Prevent Team for Channel Panel consideration.

Safeguarding Approach:

- Prevent is a safeguarding duty, not a criminal process.

- Students referred to Channel or Prevent remain members of the College community and are entitled to support, privacy and respect.
- Following any intervention, the College will work with the student, parents/carers and relevant agencies to ensure a safe reintegration and continuation of education.
- Curriculum, tutorials and Life Lessons promote critical thinking, digital resilience and respectful debate, equipping students to challenge extremist ideas safely.

4.8 Online and Digital Safety

The College acknowledges that many safeguarding concerns originate online. Risks include cyberbullying, online grooming, sextortion, harmful challenges, exposure to extremist or pornographic content, and misuse of AI-generated images.

The College will:

- Provide age-appropriate digital-literacy education through Life Lessons;
- Maintain compliant filtering and monitoring systems (see Appendix C);
- Investigate all reports of online harm in line with the *Student Behaviour and Learning Policy* and safeguarding procedures.

4.9 Substance Use and Exploitation

Misuse of alcohol, drugs, vapes or nitrous oxide may indicate exploitation or self-harm. Students found using or possessing substances are supported through a safeguarding and welfare approach, not solely disciplinary measures. Where exploitation or supply is suspected, a referral will be made to MASH or the Police. Referrals can also be made to specialist services such as Total Wellbeing and Luton Recovery Alliance.

4.10 Medical Conditions

Incidents relating to a student's medical condition will not usually require a safeguarding referral in isolation but may require support under the College's medical needs procedures. However concerns may become safeguarding matters where a student is repeatedly placed at risk through a lack of essential medication, withholding of relevant medical information, neglect, exploitation or abuse linked to their medical condition.

4.11 Mental Health and Suicide Prevention

Mental health is integral to safeguarding and wellbeing. The College recognises that poor mental health can be both a cause and a consequence of abuse, neglect or trauma, and that early recognition and compassionate intervention are key to keeping students safe. The College aims to create an environment where mental health is understood, stigma is challenged, and students feel confident seeking help.

All staff are trained to notice early indicators of distress, including:

- Withdrawal from friends or activities, tearfulness or irritability;
- Sudden decline in academic performance or attendance;

- Self-deprecating or hopeless comments ("it's not worth it", "I can't do this anymore");
- Changes in sleep, appetite, appearance or energy levels;
- Risk-taking, substance misuse or unexplained injuries;
- References to self-harm or suicidal thoughts.

Staff are not expected to diagnose but must respond sensitively, record objectively, and inform a Safeguarding Officer without delay.

Our approach:

- The College takes a whole-college approach to mental health, promoting protective factors such as belonging, achievement, and positive relationships.
- Staff are trained to use active listening and de-escalation skills, offering a calm and non-judgemental response.
- All disclosures or signs of self-harm or suicidal ideation are treated as safeguarding concerns and referred to the Safeguarding Officers.
- The College uses a triage and stepped-support model, which may include:
    - Progress Coach check-ins and wellbeing plans;
    - Short-term support from Welfare Advisors;
    - Counselling or mentoring sessions;
    - Referral to external or specialist services (CAMHS, Mental Health Crisis Teams, GPs, Talking Therapies).
- Where students are receiving external mental health support, the Welfare Advisor for Mental Health ensures multi-agency coordination and information sharing under *Working Together 2026*.

The College follows the principles of the *National Suicide Prevention Strategy (2023)* and recognises that suicidal ideation is an indicator of distress, not attention-seeking.

- Any mention or indication of suicide is taken seriously.
- In an immediate crisis, staff should stay with the student, contact the Safeguarding Team who, if necessary, call 999.
- The College will contact 111 Option 2 for urgent mental health support or signpost to local Crisis Team at the Luton and Dunstable Hospital.
- Following any crisis, a return-to-college plan is completed to ensure the student's reintegration is supported, safe and monitored.
- Post-incident support will also be offered to peers and staff who may have been affected.

Prevention and education:

- The Life Lessons programme embeds education on mental wellbeing, resilience, self-care, emotional literacy and help-seeking behaviour.
- Campaigns in conjunction with Mental Health Awareness Week and World Suicide Prevention Day encourage open dialogue and reduce stigma.
- The College promotes helplines and self-help tools such as Young Minds, Papyrus, Samaritans, and Shout.
- Supervision and wellbeing support are available for staff managing emotionally challenging cases.

4.12 Young Carers

The College recognises that young carers may experience additional safeguarding vulnerabilities, including reduced attendance, emotional fatigue, isolation, anxiety and barriers to achievement. Staff should remain professionally curious where caring responsibilities may be affecting a student's wellbeing. Early identification enables appropriate support and referral to specialist services. The College will consider whether caring responsibilities are affecting attendance, punctuality, engagement, mental health or academic progress.

4.13 Homelessness and Unregulated Accommodation

Homelessness can be both a cause and a result of safeguarding concerns. For young people aged 16–19, the risks are often hidden: "sofa-surfing," living with friends or relatives in unstable arrangements, being asked to leave the family home, or entering accommodation that is unsafe, overcrowded or exploitative.

Students may not identify themselves as "homeless," but indicators can include:

- Frequent moves or uncertainty about where they will sleep;
- Sudden changes in hygiene, attendance or engagement;
- Carrying personal belongings to college or staying on site for extended hours;
- Reluctance to return home or avoidance of discussions about home life;
- Expressions of financial hardship, family conflict, or parental rejection.

Our response:

- Any member of staff who becomes aware of or suspects housing instability must alert a Safeguarding Officer immediately if they have nowhere to go that night, or through CONTACT US under other circumstances.
- The Safeguarding Officer will assess the level of risk using the Effective Support Document and, where appropriate, liaise with Housing, MASH, or Family / Early Help to secure safe accommodation or mediation.
- For students under 18, the College will request a joint assessment between MASH and Housing to determine legal responsibilities under *Children Act 1989, s.17 or s.20*.
- For students aged 18 and over, concerns about unsafe or unregulated accommodation (including *hostels, shared houses, "sofa-surfing" or living with unknown adults*) will be referred to Adult Social Care.

The College recognises that some students may enter unregulated supported accommodation that does not provide the level of supervision or safeguarding required. Where there are concerns that accommodation is unsafe, exploitative or unsuitable, the College will:

- Inform MASH (for under-18s) or Adult Social Care (for over-18s);
- Consider whether the student is being exploited or trafficked under *Modern Slavery* or *CCE* frameworks;
- Work with Housing and voluntary agencies (e.g. Signposts, Luton Youth Advice) to source safer alternatives;

- Ensure welfare, education and emotional support continue while longer-term arrangements are secured.

Preventive and supportive measures:

- The College provides early financial and practical support through bursaries, travel passes, and hardship funding to reduce the risk of homelessness.
- Welfare Advisors offer guidance on budgeting, benefits and mediation with families or landlords.
- Progress Coaches monitor attendance and wellbeing, recognising that declining attendance may signal housing instability.
- The DDSL maintains links with Luton Borough Council Housing Options Team, Youth Homelessness services, and local charities to ensure pathways into supported housing are known and accessible.

4.14 Forced Marriage, Honour-Based Abuse and Female Genital Mutilation (FGM)

The College recognises that Forced Marriage, Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM) are serious safeguarding offences and clear breaches of human rights.

- Forced Marriage occurs when one or both parties do not consent to the marriage and pressure or abuse is used. This can include emotional, physical, sexual or financial coercion. Forced marriage is a criminal offence under the *Anti-social Behaviour, Crime and Policing Act 2014*.
- Honour-Based Abuse may involve violence, threats, control, or intimidation to protect perceived "honour" or "family reputation."
- Female Genital Mutilation is a criminal act and a form of child abuse. All staff have a mandatory duty under the *Female Genital Mutilation Act 2003 (as amended 2015)* to report to the Police if they discover that FGM has been carried out on a student under 18.

Staff must report concerns immediately to the Safeguarding Officers who will consult with the Police and MASH without delay and regardless of age. Disclosures must never be discussed with family members or community representatives before seeking advice.

Preventative education around equality, respect, bodily autonomy and cultural sensitivity is embedded though the Life Lessons programme.

4.15 Serious Youth Violence and Anti-Social Behaviour

Serious youth violence and anti-social behaviour can include weapon carrying, assaults, criminal damage, dangerous driving, and threatening behaviour. The College recognises that involvement in such behaviour may place young people at risk of exploitation, retaliation, or criminalisation.

Any concern that a student is carrying, using, or intends to use a weapon will be reported immediately to the Safeguarding Team and a risk assessment completed by the DDSL or Safeguarding Officer.

The College will:

- Treat all incidents as safeguarding concerns as well as disciplinary matters;
- Liaise with Police, MASH and Community Safety partners to manage risks;
- Provide early intervention through mentoring, mediation, and restorative approaches;
- Educate students through Life Lessons and targeted workshops on personal safety, community cohesion and lawful behaviour.

4.16 Other Concerns

The College also recognises and responds to a range of other safeguarding issues that may affect young people in the community:

- **Trafficking and Modern Slavery** - Young people may be recruited, transported or harboured for exploitation. Indicators include sudden travel, fearfulness, limited freedom of movement, or inconsistent stories. The College will refer any suspicion to MASH and the Modern Slavery Helpline (08000 121 700).
- **Hate Crime and Identity-Based Harm** - Abuse or intimidation directed at someone because of their race, religion, gender, sexual orientation, disability or identity is never tolerated. Incidents are recorded on CPOMS and addressed through safeguarding and behaviour pathways, with restorative approaches used where appropriate.
- **Economic Exploitation and Cost-of-Living Pressures -** Students may be drawn into scams, money-mule activities or risky employment due to financial hardship. The College provides financial support through bursaries, hardship funding and careers guidance, while referring safeguarding concerns to MASH.

Across all of these issues, the College takes a non-judgemental, trauma-informed and preventive approach. Every concern is recorded on CPOMS, triaged by the Safeguarding Team and addressed in line with this policy and the *Effective Support Document*. Where risk is identified, the College acts swiftly to protect the student, works collaboratively with partner agencies, and supports education and rehabilitation alongside safety.

5 Local Context and Safeguarding Priorities 2026–27

Luton Sixth Form College serves a large, diverse community where students represent a wide range of cultural, linguistic and socio-economic backgrounds. Local safeguarding intelligence indicates that the main contextual risks for young people in Luton continue to be:

- **Neglect and self-neglect** – identified by LSCP as a sustained multi-agency priority.
- **Exploitation** – particularly criminal and sexual exploitation linked to online contact, county lines and financial vulnerability.
- **Mental health and emotional wellbeing**, including self-harm and suicidal ideation.
- **Domestic and relationship abuse** among older teens.
- **Contextual safeguarding** – peer influence, online risk and community tensions.

These priorities shape the College's safeguarding strategy and training for 2026–27.
Key actions include:

- Targeted staff training on the above themes.
- Strengthening early identification.
- Embedding FutureSkills content for preventative purposes.

- Continuing close partnership with LSCP, LSAB, MASH, Prevent, and local community-safety partners.
- Using termly CPOMS data analysis to identify trends and evaluate impact.

By aligning internal priorities with those of the LSCP and wider community, the College ensures its safeguarding work remains evidence-based, locally informed and continuously improving.

6 Information Sharing, Record-Keeping and Confidentiality

6.1 Principles

Effective safeguarding relies on timely, accurate and lawful information sharing. All staff must understand that:

- Safeguarding concerns override data-protection barriers where there is risk of harm.
- Staff do not need consent to share information if a student is, or may be, at risk of significant harm.
- Information must always be shared on a "need-to-know" basis and handled securely.
- Students are entitled to privacy, but not secrecy where their safety is at risk.

6.2 Sharing Safeguarding Information

- Staff must record all concerns via CONTACT US and avoid using personal email or paper notes.
- The DDSL or DSL will decide what information to share and with whom.
- Information may be shared with:
    - MASH or Adult Social Care when risk thresholds are met;
    - Police when a crime is suspected;
    - Health or Education partners supporting the student's plan;
    - Parents/carers, unless doing so would increase risk.
- Only factual, relevant and proportionate information should be shared.
- The Data Protection Officer (Louise Barden) oversees compliance and advises on lawful sharing.

6.3 CPOMS Record-Keeping

- CPOMS is the College's secure digital safeguarding platform for recording all welfare and protection concerns.
- Entries must be made on the same working day, using objective, factual language.
- Each entry must include:
    - Date, time and name of staff member recording;
    - Description of concern and who it was shared with;
    - The student voice;
    - Actions taken or planned;
    - Supporting documents uploaded where relevant.
- The Deputy Head of Safeguarding reviews all new CPOMS entries daily and DDSL oversees case audits termly.

- CPOMS data are stored in line with the College Data Protection Policy and retention schedules.

6.4 Transferring Records

- When a student leaves the College, their safeguarding file is transferred securely to the DSL at the new setting educational setting, within five working days, and if under 18.
- Digital transfer via CPOMS “link” is preferred; if not possible, files are password-protected and sent via secure email.
- The receiving institution must acknowledge receipt.
- A record of transfer is retained by the College for audit purposes.
- Where information indicates a risk to others, or to the student themselves, a professional conversation between the College and receiving safeguarding lead will take place wherever possible.

6.5 Confidentiality and Professional Boundaries

- Staff must never discuss safeguarding information in corridors, social spaces, or online.
- Confidential conversations should only occur in private, professional settings.
- Staff should avoid keeping personal notes about safeguarding cases.
- When speaking with students, staff should not promise confidentiality and should explain that information may need to be shared to keep them safe.
- Students are reassured that only those who need to know will be informed.

6.6 Record Retention and Destruction

- Safeguarding records are retained in line with statutory guidance and the College’s Records Retention Schedule.
- Files relating to child protection or welfare are kept for 25 years from the student’s date of birth, unless otherwise directed by the DDSL or Data Protection Officer.
- Once retention expires, files are shredded or permanently deleted using secure methods, with destruction recorded for audit purposes.

6.7 Audit and Quality Assurance

- The DDSL undertakes termly audits of CPOMS data to monitor timescales, consistency, and outcomes.
- Findings inform staff training, supervision and policy updates.
- The Safeguarding Governor undertakes quality assurance activities as well as receiving anonymised audit reports each term via the Safeguarding Health and Inclusion Committee (SHIC)
- Any data breach involving safeguarding information is reported immediately to the Data Protection Officer and investigated in line with the College’s Data Protection and Data Breach policies.

7 Training, Supervision and Safer Culture

A confident, well-trained workforce is central to safeguarding. Every member of staff, volunteer and governor must understand their responsibilities, know how to recognise and report concerns, and maintain professional curiosity. Safeguarding training is ongoing, layered and proportionate to role.

7.1 Induction

- All new staff, governors, contractors and volunteers complete safeguarding induction before having unsupervised access to students.
- Induction includes:
    - Reading this *Safeguarding Young People Policy* and *KCSiE Part 1*;
    - Understanding the College's reporting process;
    - Recognising indicators of abuse and neglect;
    - The role of the DSL, DDSL and Safeguarding Officers;
    - Procedures for whistleblowing, low-level concerns and allegations;
    - Basic awareness of Prevent and online safety.
- Records of completion are retained by HR and monitored by the DDSL.

7.2 Annual and Ongoing Training

- All staff complete annual safeguarding refresher training each academic year.
- Training is updated to reflect:
    - Changes in *KCSiE* or local safeguarding procedures;
    - Lessons from LSCP/LSAB reviews and audits;
    - Emerging risks identified through CPOMS trend analysis.
- Additional workshops, newsletters and e-briefings reinforce understanding throughout the year.
- All governors receive safeguarding and Prevent training at least annually.

7.3 Role-Specific and Specialist Training

- The DDSL, DSL and Safeguarding Officers receive advanced training every two years covering:
    - Threshold decision-making and the Effective Support Document;
    - Managing complex and multi-agency cases;
    - Professional supervision;
    - Learning from local reviews;
    - Adult safeguarding and self-neglect.
- The HR Director completes Safer Recruitment training every three years.
- The Progress Coach team receives bespoke training on identifying attendance-related safeguarding indicators, motivational interviewing and trauma-informed coaching.
- Welfare Advisors and Mental-Health staff access CPD on risk assessment, suicide prevention and external referral pathways.

7.4 Supervision

Safeguarding supervision supports reflective practice, wellbeing and accountability.

- The DDSL provides case supervision for Safeguarding Officers and Welfare Advisors at least termly, and more frequently for complex cases.
- The DDSL and DSL engage in peer or external supervision annually to maintain reflective oversight.
- Supervision discussions include:
    - Case progression and decision rationale;
    - Threshold interpretation and escalation;
    - Emotional impact and resilience;
    - Lessons learned and professional development needs.
- Notes of supervision are confidential but auditable.

7.5 Safer Working Culture

The College promotes a culture where students feel safe, staff feel confident to challenge, and everyone models respectful behaviour.

Key features include:

- Professional boundaries: Clear expectations through the *Staff Code of Professional Conduct*.
- Low-level concerns: All staff must report any concern about another adult's behaviour, no matter how small. The DDSL and HR Director maintain a Low-Level Concerns Log and review patterns.
- Whistleblowing: Staff may bypass normal line management and report directly to the Principal, Safeguarding Governor or via *Public Interest Disclosure Policy*.
- Safer recruitment: Ongoing vigilance, reference checks and HR monitoring of the Single Central Record.
- Learning culture: Debriefs following incidents or reviews to identify lessons learned and improve practice.
- Visibility of safeguarding: Safeguarding messages on screens and newsletters reinforce that "safeguarding is everyone's responsibility."

7.6 Evaluating Impact

Safeguarding training and culture are evaluated through:

- Yearly staff surveys;
- Biannual student surveys;
- Analysis of CPOMS data and referral trends;
- Observation of practice (e.g., professional curiosity, quality of logs);
- Annual Section 175 audit and governor reviews.

Findings inform the College's *Safeguarding Development Plan* and continuous improvement cycle.

8 Governance, Audit and Review

8.1 Governance and Accountability

Safeguarding and promoting the welfare of students is a whole-college responsibility. Ultimate accountability rests with the Principal as Designated Safeguarding Lead (DSL), with operational

leadership delegated to the Deputy DSL (Claire Banks). The Governing Body ensures the College meets its statutory duties under *Education Act 2002 (s.175)* and *Keeping Children Safe in Education (2026)*.

The Governing Body will:

- Approve and annually review this *Safeguarding Young People Policy*;
- Monitor implementation through termly reports from the DDSL;
- Ensure safer recruitment, staff conduct, and whistleblowing procedures are in place and effective;
- Verify that training, supervision and data systems are robust and current;
- Oversee the College's compliance with the *Prevent Duty* and online-safety legislation;
- Ensure safeguarding risks are included within the College Risk Register and reviewed through the audit cycle.

The Governing Body receives termly safeguarding reports including safeguarding themes, training compliance, attendance concerns, online safety, allegations management, filtering and monitoring information, and audit outcomes.
The Safeguarding Governor acts as link governor, meeting termly with the DDSL to review data, training, audit actions and compliance.

8.2 Audit and Continuous Improvement

The College operates a structured safeguarding quality-assurance process that includes:

- Termly internal audits of CPOMS records, referral timescales and outcomes;
- Annual Section 175 audit to the Local Authority, evidencing compliance and areas for development;
- Annual Prevent self-assessment and review of the Prevent Risk Assessment and Action Plan;
- Completion of the safeguarding Compliance Checklist
- Case supervision logs reviewed to monitor consistency and decision-making;
- Post-incident reviews following significant safeguarding cases or drills to identify learning;
- Feedback loops from students, staff and partners to evaluate impact.

Findings are presented to the Senior Leadership Team and Governing Body, and incorporated into the Safeguarding Development Plan, which sets measurable objectives for the following academic year.

8.3 Policy Review and Updates

- This policy is reviewed annually each autumn term or sooner if there are significant legislative or procedural changes.
- Interim updates may be issued following new government guidance, LSCP or LSAB recommendations, or serious case review findings.
- The DDSL leads the review in consultation with the DSL, Safeguarding Governor and HR Director.
- The updated policy is ratified by the Corporation and published on the College website and staff intranet.

8.4 Communication and Accessibility

- All staff, students and parents are made aware of this policy and the College's safeguarding arrangements at induction.
- The policy is available on the College website, intranet and printed on request.
- A student-friendly summary is displayed across campus and on the intranet.
- Key contact details (DSL, DDSL, Safeguarding Officers, and MASH) are visible on screens and posters.

8.5 Commitment to Learning and Improvement

Luton Sixth Form College is committed to maintaining a safeguarding culture characterised by:

- Transparency, professional curiosity and reflective practice;
- Continuous learning from local and national reviews;
- Collaboration with students, staff, parents and external partners;
- The belief that every student, regardless of background or circumstance, deserves to feel safe, valued and supported.

Safeguarding is not a static process but an evolving commitment to vigilance, compassion and improvement.

Responding to a Disclosure

1. Listen — do not lead.

- Stay calm, open, and non-judgemental.
- Allow the student to speak in their own words; silence is fine.
- Avoid showing shock, anger, or disbelief.

2. Reassure.

- Acknowledge what you've heard: "I'm really glad you told me."
- Do **not** promise confidentiality — explain you may need to share information to help keep them safe.
- Emphasise that they have done the right thing by speaking up.

3. Clarify — don't investigate.

- Ask only open prompts if absolutely necessary (e.g. "Can you tell me what you mean by that?").
- Never ask leading or "why" questions.
- Do not press for details, names or evidence.

4. Record immediately.

- Make brief factual notes at the time if possible.
- Record on **CONTACT US** as soon as practicable (same working day).
  Include:
  - Student's words verbatim where possible;
  - Time, date, place, and context of disclosure;
  - Your response and who you informed.
- Mark entries *Safeguarding – Disclosure* for DDSL visibility.

5. Report without delay.

- Tell a **Safeguarding Officer** or the **DDSL** in person or by phone straight away if the disclosure is harm is serious / significant / immediate.
- If the DDSL is unavailable and there is **immediate risk of harm**, contact:
  - **MASH:** 01582 547653 / 0300 300 8123 (out of hours) / MASH@luton.gov.uk
  - **Police:** 999 (emergency) or 101 (non-emergency).

6. Preserve evidence.

- Do not delete, forward, or print digital messages or images; secure them for the safeguarding team.
- Do not examine injuries — note only what is visible.

7. After the disclosure.

- Offer ongoing reassurance and explain next steps simply.
- Do not confront or discuss with the alleged perpetrator.
- Maintain discretion — share information only with safeguarding staff.
- Look after your own wellbeing; speak to your line manager or the DDSL for support.

Remember:

You are not investigating — you are ensuring information reaches the right people quickly and accurately.

Managing Allegations and Low-Level Concerns

1 Purpose

To ensure any concern about the conduct of an adult working at or on behalf of the College—whether paid, unpaid, permanent, agency, contractor, or volunteer—is reported, recorded, and managed quickly, fairly, and in line with statutory guidance.

2 Definitions

Type of Concern	Description / Examples	Reporting Route
Allegation	Behaviour that has harmed, or may have harmed, a student; possibly committed a criminal offence; or indicates that the adult may pose a risk to children or vulnerable adults	Report immediately to the Director of HR or DDSL. The allegation will be shared with the LADO the same day.
Low-Level Concern	Behaviour that is inconsistent with the Staff Code of Conduct but does not meet the threshold for an allegation. May include boundary issues, over-familiarity, or minor breaches of professional expectations	Report to the Director of HR or DDSL for recording on CPOMS StaffSafe. Logs are reviewed termly for patterns. Behaviour to be addressed via line management structures and investigation.
Whistleblowing	Serious malpractice or deliberate cover-up where usual procedures may not be effective.	Use the Public Interest Disclosure (Whistleblowing) Policy or contact the Safeguarding Governor directly.

The College will ensure that volunteers are subject to the appropriate safeguarding checks in line with the current definition of regulated activity as set out in KCSIE 2026 and the Crime and Policing Act 2026.

3 Immediate Actions

1. Do not investigate yourself.
2. Inform the DDSL or HR Director immediately—verbally or via this link.
3. If the concern involves the Principal, report directly to the Safeguarding Governor.
4. The DDSL and HR Director decide whether the case meets the threshold for LADO consultation.
5. Record the decision and rationale in CPOMS StaffSafe.

4 Referral to LADO

If an allegation meets the statutory criteria, the Director of HR contacts the LADO (Paul James) within one working day.

The LADO will:

- Advise whether the matter should proceed as a formal investigation;
- Coordinate information-sharing with Police or Social Care;
- Provide oversight of process and outcome.

The staff member concerned will be informed of the allegation as soon as appropriate and offered HR and union support.

5 Possible Outcomes (post-investigation)

- **Substantiated:** allegation proven on the balance of probabilities.
- **Unsubstantiated:** insufficient evidence either way.
- **Unfounded:** no evidence or misinterpretation of event.
- **Malicious:** deliberate fabrication.

The DDSL/HR Director ensures that learning and preventive actions are captured in supervision and training.

6 Low-Level Concerns Process

1. Report immediately to the DDSL or HR Director. Anonymous reporting is available here.
2. Low level concern is logged on CPOMS StaffSafe.
3. Behaviour addressed via Line Management structures.
4. Review undertaken by DDSL and HR Director—pattern analysis each term.
5. If repeated or escalating, re-classified as an allegation and referred to LADO.
6. Annual anonymised analysis shared with SLT and Governors to identify culture or training issues.

7 Confidentiality

All information is managed sensitively and stored securely on CPOMS StaffSafe and HR systems. Only those who need to know are informed. Records of allegations are retained for the period recommended in *KCSiE 2026* and the College Records Retention Schedule.

8 Key Principles

- Every concern matters—no threshold is too low to report.
- Fairness for all parties: staff are presumed innocent until an investigation concludes.
- Transparency and learning: patterns are used to strengthen safeguarding culture, not to assign blame.
- Wellbeing support is available for anyone involved in an allegation or investigation.

Online Safety, Filtering and Monitoring

C.1 Overview

Luton Sixth Form College recognises that the online environment is integral to students' education, social life, and personal development. However, it also presents risks including exploitation, grooming, image-based abuse, cyber-bullying, radicalisation, and exposure to inappropriate content. Online safety is therefore treated as a safeguarding priority, not an IT issue. The College promotes a culture where students and staff use technology responsibly, respectfully and safely. The Deputy Head of Safeguarding receives regular reports regarding filtering and monitoring activity and escalates safeguarding concerns in accordance with this policy.

C.2 Roles and Responsibilities

- **DDSL:** overall strategic responsibility for online-safety education, filtering and monitoring oversight, and response to digital safeguarding incidents.
- **Data Protection Officer:** ensures compliance with the *Data Protection Act 2018* and advises on lawful information processing.
- **IT Services:** maintain filtering and monitoring systems and ensure compliance with DfE technical standards.
- **Staff:** model appropriate use of technology, supervise online activity, and report any concern to Safeguarding Officers.
- **Students:** expected to follow the *ICT Acceptable Use Policy* and report anything that makes them uncomfortable online.

C.3 Filtering and Monitoring Standards

The College's filtering and monitoring arrangements meet or exceed the *Filtering and Monitoring Standards for Schools and Colleges (2023)*:

Standard	**How the College Complies**
Filtering	Web filtering blocks access to illegal, harmful, extremist, or adult content. Reviewed termly with IT Services and DDSL oversight.
Monitoring	Activity monitoring identifies potential risk behaviours (e.g. bullying, self-harm, extremism, exploitation). Alerts reviewed daily by trained IT and safeguarding staff.
Governance	Reports presented termly to DSL, DDSL and Safeguarding Governor. Issues escalated through the audit process.
Staff Training	Annual CPD covers online risks, privacy, AI, and emerging platforms.
Review Cycle	Filtering and monitoring systems are formally reviewed at least annually. Reviews include testing filtering functionality across internet-connected devices and maintaining records of those checks.

C.4 Responding to Online Incidents

All online-safety incidents are safeguarding concerns. Staff should:

1. Record promptly on CONTACT US.
2. Preserve evidence — do not delete, forward or print material.
3. The Safeguarding Officers will assess risk and, where appropriate, liaise with **MASH, Police Cyber Crime Unit, or the Prevent Team**.
4. Parents/carers will be informed unless this increases risk to the student.

Specific scenarios such as sexting, harmful online challenges or image-based abuse are managed using the **UKCIS Non-Statutory Guidance (2023)** and LSCP procedures.

C.5 Generative AI

The College recognises the opportunities and safeguarding risks presented by generative artificial intelligence (AI). Staff and students using AI-enabled systems must do so in accordance with College policies relating to safeguarding, data protection, online safety and acceptable use. The College will consider risks relating to inaccurate content, misinformation, deepfakes, image manipulation, privacy, bias and harmful content when implementing AI technologies.

C.6 Education and Prevention

- FutureSkills curriculum includes digital resilience, consent, online relationships, cyber-ethics and misinformation.
- FutureSkills addresses current trends including AI-generated content, deepfakes, sextortion, online misogyny, algorithmic influence and emerging digital harms.
- Awareness campaigns (Safer Internet Day, Anti-Bullying Week) reinforce positive digital citizenship.
- Parents and carers are signposted to resources such as ThinkUKnow and Internet Matters.

C.7 Audit and Review

- The DDSL and IT Services undertake an annual online-safety review.
- Findings feed into the *Safeguarding Development Plan* and inform staff training priorities.
- Outcomes are reported to the Governing Body through termly safeguarding updates.

Designated Safeguarding Lead Cover Arrangements

Purpose

Luton Sixth Form College recognises that safeguarding concerns can arise at any time and that students, staff and partner agencies must be able to access safeguarding support without delay. The College therefore maintains robust safeguarding cover arrangements to ensure that safeguarding concerns are received, reviewed and acted upon promptly during periods when the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) are unavailable due to illness, annual leave, training, meetings or other absence. Safeguarding arrangements operate throughout the academic year and are supported by access to CPOMS, CONTACT US and designated safeguarding personnel.

Designated Safeguarding Lead (DSL)
The Designated Safeguarding Lead is:
Altaf Hussain - Principal
Where the DSL is unavailable, operational safeguarding responsibility remains delegated to the Deputy Designated Safeguarding Lead.

Deputy Designated Safeguarding Lead (DDSL)
The Deputy Designated Safeguarding Lead is:
Claire Banks - Director of Safeguarding, Inclusion & Skills
The DDSL has delegated authority from the DSL to:

- Make safeguarding decisions;
- Undertake risk assessments;
- Make referrals to MASH, Adult Social Care, Police, Prevent and other agencies;
- Chair safeguarding meetings;
- Access and manage CPOMS records;
- Authorise information sharing where safeguarding concerns arise;
- Implement safeguarding plans and protective measures.

Safeguarding Officer Cover Arrangements
Where the DDSL is absent, safeguarding responsibilities are shared by the safeguarding operational team:

- Jay Sahota, Head of Personal Development, Behaviour & Attitude
- Shaheen Abdouramane, Deputy Head of Safeguarding
- Neil McNickle, Deputy Head of Behaviour
- Pam Williams, Welfare Advisor (Safeguarding)
- Edyta Sieklinski, Welfare Advisor (Mental Health)

The safeguarding team provides operational continuity and ensures concerns continue to be assessed and escalated appropriately.

Where complex, high-risk or statutory safeguarding decisions are required during the absence of both the DSL and DDSL, consultation will take place with an available member of SLT and relevant external safeguarding agencies.

Access to Safeguarding Systems
CPOMS and CONTACT US submissions are monitored each working day by designated safeguarding personnel. Arrangements are in place to ensure new concerns are reviewed during periods of DSL or DDSL absence.

The College ensures that safeguarding concerns can continue to be received and monitored through:

- CONTACT US safeguarding reporting system;
- CPOMS safeguarding records system;
- College email and telephone systems;
- Direct reporting to Safeguarding Officers.

Access permissions are maintained to ensure that safeguarding records remain available to authorised safeguarding staff during periods of absence.

Immediate Risk of Harm
Where a student is believed to be at immediate risk of significant harm, staff must not delay action whilst attempting to locate the DSL or DDSL.

Staff should:

1. Contact a Safeguarding Officer immediately.
2. Contact emergency services if required.
3. Contact MASH where safeguarding thresholds are met.
4. Record all actions on CONTACT US at the earliest opportunity.

The safety of the student remains the primary consideration at all times.

Educational Visits, Enrichment Activities and Off-Site Provision
For educational visits, work placements, enrichment activities or other off-site provision, the visit lead must know how to contact a designated safeguarding professional during the activity. Appropriate safeguarding escalation arrangements will be communicated before the activity takes place.

Saturday Opening, College Closures and Holiday Periods

During Saturday opening, the Head of Achievement, who has completed Designated Safeguarding Lead training, provides safeguarding oversight for students attending College. Any safeguarding concern will be managed in line with this policy, with immediate action taken where required and prompt referral to the DSL, DDSL or Safeguarding Team for ongoing assessment, decision-making and case management.

Although routine safeguarding arrangements operate during term time, the College maintains procedures for managing safeguarding concerns received during holiday periods, enrolment activities, results days or other periods when students may be on site.

Where safeguarding concerns are identified during such periods, they will be reviewed by an appropriate safeguarding lead and referred to external agencies where necessary.

Monitoring and Review

The DSL and DDSL will review safeguarding cover arrangements annually and following any significant safeguarding incident to ensure that arrangements remain effective, proportionate and compliant with statutory guidance.

Meet Your Safeguarding Team

Safeguarding Leads



Altaf Hussain
(AXH)
Principal
Designated
Safeguarding Lead



Claire Banks
(CLB)
Director
Dept SG Lead
Safeguarding Officer



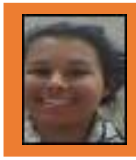
Sayeda Meghjee
(SKM)
Director of Human Resources



Jay Sahota
(JQS)
Head of Personal Development, Behaviour & Attitude



Neil McNickle
(NQM)
Dept Head Behaviour, Attitude & Development



Shaheen Abdouramane
(SWA)
Deputy Head of Safeguarding

Safeguarding Operators



Pam Williams
(PXW)
Student Welfare Advisor
(Safeguarding)



Edyta Sieklinski
(EMS)
Student Welfare Advisor
(Mental Health)



Emily Parkes
(EKP)
Student Welfare Advisor
(Intervention)



Louisa Turner
(LJT)
SENDCO

Specialists



Mo Shah
(SMS)
Security Manager



Umara Khan
(UXK)
Progress Coach Coordinator

Trained

Teachers, Progress Coaches, AIMS, Business Services

CONTACT US

Our Promise

Everyone has the right to feel safe, respected and supported. Safeguarding is everyone's responsibility.

If you are worried about yourself or someone else remember 4 R's

Recognise	Respond	Record
the signs that someone may be at risk – changes in mood, behaviour, attendance or appearance	calmly and listen; reassure the person that they've done the right thing in telling you.	what you have seen, heard or been told – stick to facts, not opinions
Report		
Use the single point of entry for information and support called CONTACT US Use the QR code, links on the website, links on My Learning pages	**We can help with** ⊙ Abuse, neglect or exploitation ⊙ Bullying or online harassment ⊙ Mental health or self-harm concerns ⊙ Relationship or family problems ⊙ Homelessness or financial hardship ⊙ Radicalisation or extremism ⊙ Any worry that makes you feel unsafe	**If harm is SIGNIFICANT / SERIOUS / IMMEDIATE find a safeguarding officer straight away – DON'T USE ONLINE REPORTING. Officers can be found in WESTSIDE & PC Workroom**

Who to Contact:

Designated Safeguarding Lead (DSL):	Altaf Hussain, Principal
Deputy Designated Safeguarding Lead (DDSL):	Claire Banks, Director
Safeguarding Officers & First point of contact:	Jay Sahota, Head of Dept
	Shaheen Abdouramane, Deputy Head
	Neil McNickle, Deputy Head
	Pam Williams, Safeguarding Officer
	Edyta Sieklinski, Mental Health Advisor

MASH (Luton Borough Council): 01582 547653

Out of Hours: 0300 300 8123

Police: 999 (emergency) / 101 (non-emergency)