SAFEGUARDING POLICY & PROCEDURE

1. Introduction

1.1 Adult Education policy on Safeguarding still derives from Keeping Children Safe in Education. The 2026 KCSIE update now defines Safeguarding as

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

1.2 Fircroft College recognises that members of staff, governors and students all have a role to play in safeguarding individuals at risk and preventing their abuse.

2. Safeguarding Adults

2.1 The safeguarding of adults at risk of harm is not an option but a responsibility across all organisations. The expectation for all "at risk" adults is that they are empowered to be free from any preventable harm or exploitation. They are enabled to make their own choices about their lives and to live as independently as their personal circumstances may permit.

2.2 An adult is a person aged over 18 years of age.

3. Safeguarding Children

3.1 If there are any safeguarding concerns regarding children of students or visitors to the college, the safeguarding policy will apply.

3.2 Children should not normally be on site but if they are, they should be in the care and responsibility of their parent or guardian. The College is an Adult Education Provider and we do not have on-site childcare provision. Where short course students have a last-minute breakdown in childcare arrangements, we will give them option to be a non-resident, learn online if possible or request that they withdraw from the course on this occasion and provide them with an alternative option to study.

Children are not allowed in classrooms when adult courses are taking place under any circumstances. Children may be allowed on-site on occasions and these include:

- If accompanied and supervised by a parent or guardian for a short period of time for example to enquire about short courses or access community events or services.
- Long course resident students' children for short visits with the permission of the College in emergency situations.

Children cannot stay overnight at the college

4. Promotion of Health and Development

4.1 The college aims to provide a supportive environment that will help learners with mental health difficulties to realise their academic potential and meet course requirements. We also aim to facilitate and promote positive mental health and well-being.

4.2 The College recognises that whilst many mental health concerns can be appropriately supported through wellbeing and learner support services, some may escalate into safeguarding concerns where there is a risk of harm to the individual or others. Staff are expected to recognise the signs of deteriorating mental health, assess concerns appropriately and refer them through safeguarding procedures where necessary.

4.3 The college embeds a proactive approach to Safeguarding and Prevent through covering the subject in lessons and delivering enrichment activities in this area also.

4.4 The college recognises the significance of the Equality Act 2010 to college safeguarding, including that colleges: must not unlawfully discriminate against students because of their protected characteristics and must consider how they are supporting students with protected characteristics by taking positive action, where proportionate, to deal with the disadvantages these pupils face.

4.5 The College recognises that some learners, including those known to or previously supported by social care services, care-experienced learners, learners with SEND, high-needs learners, disadvantaged learners and those experiencing barriers to learning or wellbeing, may be at increased risk of harm. The College will take appropriate steps to identify, support and monitor the needs of these learners and work collaboratively with relevant agencies where appropriate.

4.6 The importance of providing a safe space for LGBTQ+ students to speak out and share their concerns is also recognised within the college

5. Safe Recruitment and Selection of Staff, Governors, Volunteers and Partners

5.1 The College has a Recruitment and Selection of Staff Policy linking explicitly to this policy. The policy statement regarding safeguarding is included in all job advertisements, publicity material, recruitment websites and candidate information packs

5.2 The recruitment procedure is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard any adult who may be considered to be 'at risk' and to deter, reject or identify people who might abuse individuals or are otherwise unsuitable to work with them.

5.3 Partner organisations and their staff working with the college are required to have their own safeguarding training in place or alternatively complete the college safeguarding training before working in partnership.

6. What is abuse?

6.1 Abuse can be defined as 'the mistreatment by any other person or persons that violate a person's human and civil rights.'

6.2 Abuse can be generally defined into one of the following categories:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Financial abuse
- Self-Neglect
- Neglect or act of Omission
- Organisational abuse
- Modern slavery
- Domestic abuse
- Discriminatory abuse
- Exploitation

This reflects the 2026 KCSIE guidance that abuse includes neglect and exploitation

6.3 The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life to causing actual physical or mental suffering. Other examples of possible concern include:

- Peer-on-peer abuse
- the impact of new technologies on sexual behaviour including making and sharing of online materials, image generation or artificial intelligence (AI) generated materials.
- issues that may be specific to a local area or population, for example gang activity and youth violence
- female genital mutilation
- honour-based violence

- forced marriage
- child sexual exploitation (CSE)
- cuckooing

6.4 Abuse can happen anywhere: in a person's own home; in a residential or nursing home; in a hospital; in the workplace; at a day centre or educational establishment; in supported housing, in the street or online. This is the "contextual approach" we take at Fircroft.

6.5 Our focus at the College is to be vigilant regarding looking for signs that an individual may be at risk whilst on the premises or being abused outside of the College.

6.6 We recognise that witnessing abuse has an impact in itself

7. Who can abuse?

7.1 The person responsible for the abuse can be well known to the person being abused, and could be:

- a paid carer in a residential establishment or from a home care service
- a social care worker, health worker, nurse, doctor or therapist
- a relative, friend, or neighbour
- another resident or person using a service in a shared care setting
- someone providing a support service
- a person employed directly by someone in their own home as a carer or a personal assistant

Others can be strangers who:

- befriend vulnerable people with the intention of exploiting them including blackmail and grooming.
- deceive people into believing they are from legitimate businesses, services or utility providers.
- intimidate vulnerable people into financial transactions they do not want or cannot understand.

7.2 All staff should be aware that students can abuse other students and that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence.
- Sexual harassment.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images.
- Upskirting - which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

8. Safeguarding responsibilities and training

8.1 Safeguarding is everyone's responsibility and it involves:

- being aware of the risks of abuse and neglect that individuals can face
- recognising the signs of abuse
- being alert to early indicators such as problems with attendance at college
- knowing what help is available and who to report concerns to
- understanding their responsibilities
- working together to report and investigate concerns
- working together to prevent abuse and neglect
- the five R's of Safeguarding are recognise, respond, report, record and refer

8.2 The Designated Safeguarding Lead and the Safeguarding Team will attend training opportunities on an annual basis to stay up to date with Safeguarding and Prevent matters.

8.3 The Safeguarding Team will ensure that new Safeguarding and Prevent training at induction and that all staff, volunteers and governors receive annual training on Safeguarding and Prevent matters including points noted in 8.1 and new and emerging concerns.

8.4 We record all concerns, whether referred as cases or not.

8.5 Further information relating to responsibilities can be found in the delegation of authority (Appendix 2) and responsibilities list (appendix 3).

9 Online Safety

9.1 The College recognises that safeguarding learners, and providing them with the skills to safeguard themselves when using technology, is a key aspect of the College educational offer and the key focus of the College online safety. This is a Safeguarding and welfare concern and not just a matter for the college IT team. The DSL should take lead responsibility for understanding the filtering and

monitoring systems in place at the college and it should be covered in staff safeguarding training.

9.2 The College also recognises that banning, blocking and filtering approaches, though useful, cannot be regarded as sufficient protection for learners and it does not relieve the College of a duty of care with regard to safeguarding learners and employees. Through a combination of effective policies and practice, a robust and secure technological infrastructure and education and training for learners and staff, the College have developed an effective online safety strategy across all learning provision which includes:

- Provide a safe environment for all learners and employees
- Adhere to legal responsibilities
- Ensure that technologies are used responsibly in order to support innovative and effective learning and teaching
- Educate learners to identify the risks technology can present, and help them develop the skills they need to safeguard themselves
- Assess the risks presented by technology and develop appropriate policies and guidance to mitigate against those risks
- Involve managers, staff and learners in developing acceptable use policies and establishing reporting procedures for unacceptable use.
- Promote a culture of online safety within the College.
- Ensures that there are appropriate filters and monitoring systems are in place, whilst ensuring that “over blocking” does not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

9.3 Governing bodies should regularly review the effectiveness of college filters and monitoring systems.

They should ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

The latest Department for Education filtering and monitoring and cyber security standards should be read and regarded when assessing whether the appropriate systems are in place. The standards can be found at

https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

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9.4 Online safety risks can be broadly mapped across four areas:

Contact:
Which may be unwelcome or inappropriate, including grooming or sexual contact.

Commerce:
Illegal activity such as phishing or identity theft.

Content:
This could include inappropriate or illegal content, material that incites racial hatred, condones and encourages support for terrorism and forms of extremism leading to terrorism or criminally obscene content. It also includes the inappropriate public posting of material. This may apply to employees equally as to learners, and may include the inappropriate and potentially unsafe posting of personal data, or the posting of material that brings the individual or the provider into disrepute or impacts upon their business.

Conduct:
Includes activities carried out against the learner and also those carried out by the learner. This category includes anti-social or illegal behaviour, and the ranges of behaviours and activities that make up cyber bullying

The growth of Generative Artificial Intelligence may make it more challenging for learners and staff to correctly identify these risks.

9.5 Emerging online safety incidents will be reported to the designated person in line with the College safeguarding policy.

9.6 All teaching staff have the responsibility of educating students in their care about safe internet practice, including the reporting of any unsuitable material that finds its way through the College's web safety filter.

9.7 Through continuous and appropriate staff development, the College will seek to ensure that staff have the skills, knowledge and understanding required to both assess and mitigate against risks, and help learners develop the skills necessary to operate safely in a digital environment.

9.8 The growth of Generative AI has significantly altered the landscape of online safety, making it more challenging for both staff and learners to correctly identify risks related to content, contact, and conduct.

9.9 Under the 2026 statutory guidance, the term "making or sharing nudes and semi-nudes" now explicitly includes images that are digitally altered or wholly generated using AI, commonly referred to as "deepfakes" or "deep nudes". These images can be highly convincing, making it difficult for victims to prove the

imagery is fake, which can lead to increased distress, shame, and reluctance to report the abuse.

9.10 To effectively identify and mitigate these risks, the College implements the following:

Educational Curriculum: Learners must be taught about online harms, including the prevalence of deep fakes, pornography, and how to seek help when they encounter such material.

Staff Awareness: All staff must be trained to recognise that technology is a significant component in many safeguarding issues and that AI-generated abuse should be treated with the same seriousness as face-to-face abuse

Filtering and Monitoring: The Designated Safeguarding Lead (DSL) takes responsibility for understanding how the College's filtering and monitoring systems apply to the use of generative AI in education

Zero-Tolerance Culture: The College maintains a zero-tolerance approach to the making or sharing of AI-generated nudes or semi-nudes, recognising it as a form of abuse that requires a mandatory safeguarding response

10 Safety at Work

10.1 In accordance with the college Health and Safety Policy so far as is reasonably practicable, the college will provide and maintain a safe

place of work, safe machinery and equipment and safe and healthy working environments.

10.2 Trained first aiders are available on site at all times in accordance with the college estates policy. First aid kits are located throughout the premises.

10.3 The safety and safeguarding of students on educational trips is covered in the college Trips and Visits Policy.

11 Radicalisation and Extremism

11.1 The College encourages students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that biased political views are not

promoted in the teaching of any subject in the College and where political issues are bought to the attention of the students; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to students.

11.2 We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both staff, governors and students have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights. (See Freedom of Expression Policy).

11.3 We seek to protect all students against extreme religious or political ideology and messages of violent extremism.

11.4 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and governors will understand what radicalisation and extremism is, why we need to be vigilant in College and how to respond when concerns arise.
- There are systems in place for keeping people onsite safe from extremist material when accessing the internet in our College by using effective filtering and usage policies.
- The Designated Safeguarding Leads have received Prevent training and will act as the point of contact within our college for any concerns relating to radicalisation and extremism.
- The Designated Safeguarding Leads will make referrals in accordance with Birmingham Safeguarding Adults Board (BASB) procedures and will represent our college at Channel meetings as required.
- We encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- Effective arrangements are in place to identify and respond to tensions on or off campus which might impact upon staff, student and/or public safety in accordance with the college's External Speakers Policy.

11.5 The College's 'Preventing Radicalisation' Guidance has further information.

12 Discrimination and/or Bullying Incidents

12.1 All incidences of discrimination or bullying, including matter relating to protected characteristics, will be dealt with in accordance with our Student Charter and any action will be in line with the colleges Disciplinary Policy.

13 Reporting Procedures

13.1 Students sometimes report information concerning an allegation or suspicion of abuse/neglect to any member of staff. Members of staff can also independently identify concerns relating to suspicion of abuse/neglect. This should always be passed on to a member of the Wider Safeguarding Team. This applies to concerns raised by students or members of staff. (see appendix 1 for further information).

13.2 If the allegation involves a member of the safeguarding team, then the Designated Safeguarding Lead - DSL should be the first point of contact (there are currently two DSL's). If the allegation involves a DSL, the Principal or the other DSL should be the first point of contact. If the allegation involves the Principal, then the details should be passed to the Chair of the Governing Body.

13.3 Where a student divulges information concerning abuse/ neglect to a member of staff, the member of staff should make a written record of the information on a safeguarding incident report form and discuss the situation with the Duty Manager as soon as possible.

13.4 A member of the Wider Safeguarding Team or DSL will investigate the concern raised and, in consultation with the Principal, will decide whether or not to contact the local Adult and Communities Access Point.

Consideration will be given to:

- The scale of the abuse
- The risk of harm to themselves or others
- The capacity of the student to understand the issues of abuse and consent

13.5 In emergency situations (e.g. where there is the risk of, or occurrence of severe physical injury), the emergency services must be contacted by the Safeguarding Officer, DSL or Duty Manager (or the most senior member of staff on site if none of those listed are available).

Where a crime is taking place, has just occurred or is suspected, the Police must be contacted immediately by the Safeguarding Officer, DSL or Duty Manager (or the most senior member of staff on site if none of those listed are available).

14 Reviewing Safeguarding

14.1 All Safeguarding incidents are logged on the Student Services system.

We will also record what referrals we made and what lesson we learnt from the incident. The number of incidents of safeguarding including the category and outcomes are reported to Management Team monthly and Governors termly.

14.2 The Safeguarding Team will regularly review safeguarding records and case files to ensure concerns are managed appropriately, records are complete and actions are followed up. Themes, trends and lessons learned from safeguarding cases will be used to inform staff training, policy development and continuous improvement of safeguarding practice.

14.3 The Safeguarding Policy will be reviewed on a yearly basis and also reviewed for effectiveness immediately under any new situation such as a pandemic emerges presenting significant new safeguarding risks.

15 Confidentiality

15.1 If a student, member of staff, volunteer or governor has been told about the allegation of abuse/ neglect in confidence, they should explain to the person concerned that they are required to pass the information on to the College and the details will be dealt with confidentially (the gaining of the consent is not essential in order for information to be passed on).

16 Reporting Obligation

16.1 All members of staff, learners, volunteers and governors have an obligation to report any inappropriate behaviour that could be a potential safeguarding issue. This includes the behaviour of both learners, colleagues, volunteers and governors. Learners have the option to report these matters anonymously by completing a student feedback form.

16.2 Potential safeguarding incidents are investigated internally by the Designated Safeguarding Lead and/or a Safeguarding Officer and an external referral will be made if appropriate. Safeguarding incidents are reported and reviewed at Management Team meetings. The Designated Safeguarding Lead and Safeguarding Officer and any other staff conduct lessons learnt meetings after potential safeguarding or safeguarding incidents to inform future practise.

16.3 Safeguarding cases will also be reported to the link governor without identifying individuals involved to discuss good practise and lessons learnt going forward.

17 Public Interest Disclosure (Whistle blowing)

17.1 Where a member of staff, volunteer or governor reports concerns about a colleague, the College will protect that person in line with the College's Public Interest Disclosure Policy. This involves supporting the individual and ensuring confidentiality as far as possible.

17.2 Individuals can make public interest disclosures anonymously and these matters will be investigated accordingly.

18 Responsibilities

18.1 All members of staff, volunteers and governors have a responsibility to be aware of this policy and to report any suspicions that they might have, or information that they receive concerning safeguarding issues to a DSL.

18.2 Training will be provided as part of ongoing staff development and all new staff will receive information at their induction.

18.3 The Management Team member responsible for Safeguarding and Prevent is the DSL and in their absence the Principal

18.4 The Link Governor responsible for Safeguarding at Board level is Julie Hughes.

19 Overnight Visitors

19.1 The college does not allow any planned or unplanned visitors during either the day or to stay overnight.

20 DBS Checks

20.1 Disclosure and Barring Services checks will be carried out in accordance with College Policy.

21 Out of College Contacts

21.1 If required, appropriate out of college contacts can be accessed via the Emergency Incident Management Plan

21.2 If a crime is taking place and immediate assistance is needed call the police on 999. To report a crime in a non-emergency situation, call 101.

21.3 If it is not an emergency and you want to report adult abuse please call the 'Adults & Communities Access point.' (ACAP) on 0121 303 1234 and press 2 on your keypad.

E-mail – acap@birmingham.gov.uk

22 Out of Hours

22.1 Birmingham City Council Emergency Duty Team (Mental Health): 0121 675 4806

22.2 Any concern about the safety/ welfare of children should be reported to the

Information Advice Support Services (IASS) Birmingham City Council on 0121 303 1888 or e-mail IASScitywide@birmingham.gov.uk

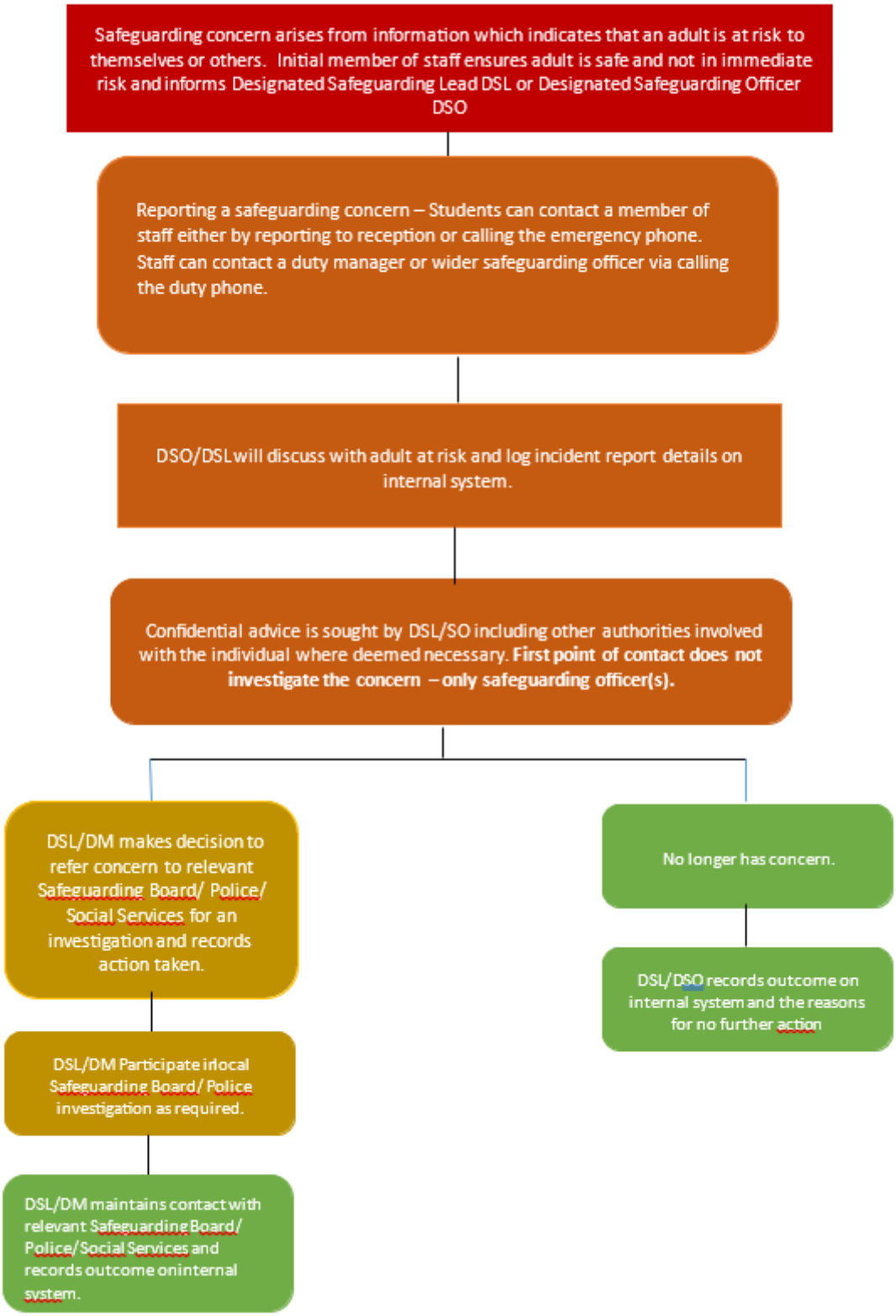
Outside of normal hours please contact 0121 675 4806.

23 Informing DfE/WMCA about Serious Incidents

23.1 Where students are funded by the Department for Education (DfE) or West Midlands Combined Authority (WMCA) the College may notify the funder regarding any serious safeguarding incidents which result in police investigations where other learners or the wider public may be at risk.

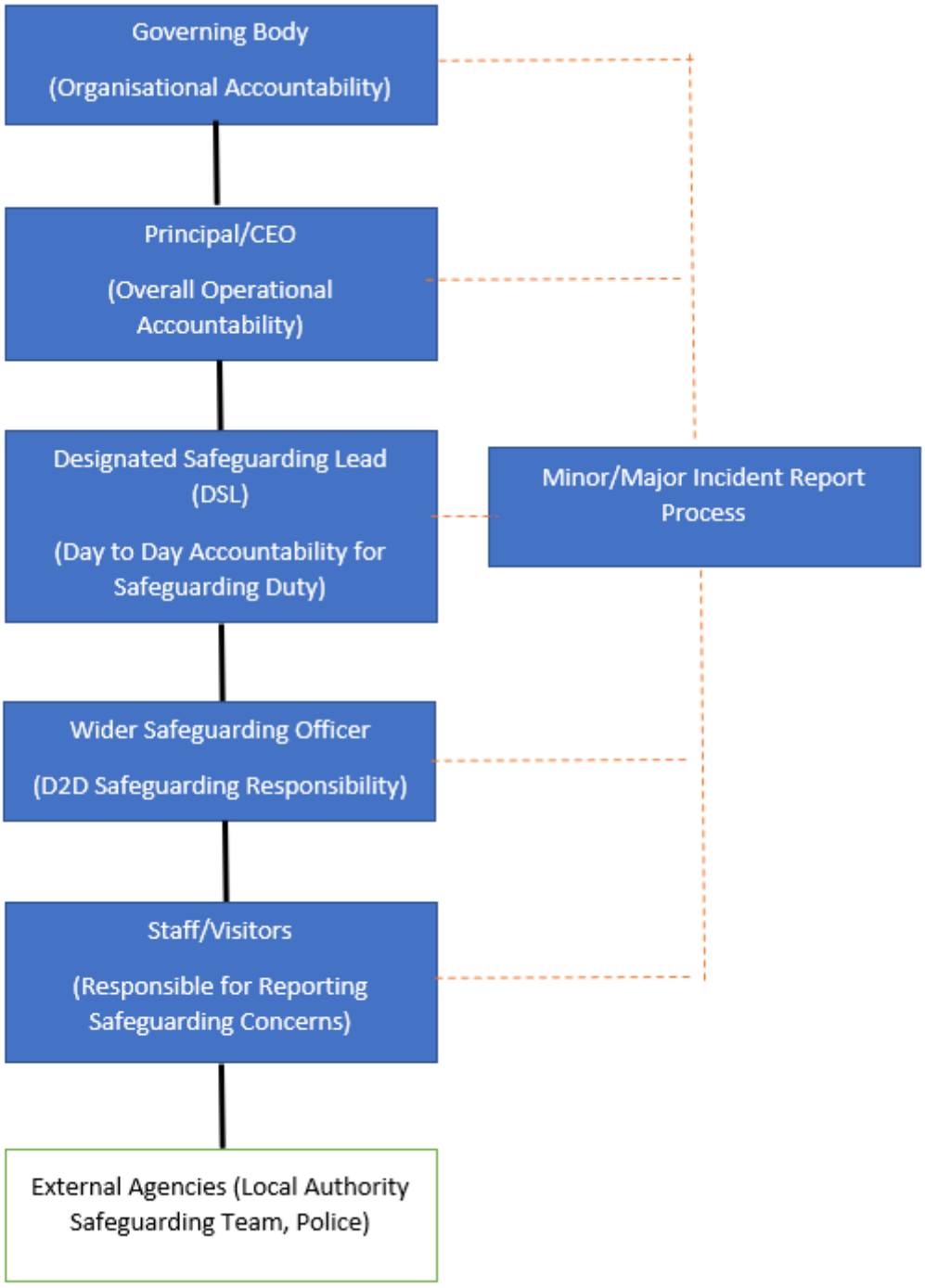
23.2 Prevent: The College must notify the DfE or WMCA that a referral has been made, no other information should be provided.

Appendix 1 Safeguarding Reporting Process



Appendix 2

Safeguarding Duty – Delegation of Authority



Appendix 3

Responsibilities

1. Governing Body / Board

- **Overall Accountability**: Ensures the college has effective safeguarding policies and procedures.
- **Strategic Oversight**: Monitors compliance with statutory requirements.
- **Lead Governor for Safeguarding**: Provides challenge and support to senior leaders.

2. Principal / Senior Leadership Team

- **Leadership Responsibility**: Ensures safeguarding is embedded in the college culture.
- **Policy Implementation**: Makes sure strategically the organisations policies and procedures are up to date and staff are trained.
- **Resource Allocation**: Provides adequate resources for safeguarding.

3. Designated Safeguarding Lead (DSL)

- **Central Role**: The main point of contact for safeguarding concerns.
- **Case Management**: Coordinates referrals to local authority, police, or other agencies.
- **Training & Awareness**: Ensures staff understand safeguarding procedures.
- **Record Keeping**: Maintains accurate and confidential records.

4. Wider Safeguarding team (Duty Manager's)

- **Support Role**: Assists the DSL and acts in their absence.
- **Case Management: Act as first point of contact whilst on duty. Act as support to wider safeguarding team where needed. Investigate safeguarding concerns where needed.**
- **Specialist Knowledge**: Often covers specific areas like Prevent (counter-terrorism) or online safety which the college may look to adopt in the coming terms.

5. All Staff and Visitors

- **Duty of Care**: Every staff member has a responsibility to safeguard learners.
- **Reporting Concerns**: Must follow the college's safeguarding policy and report any concerns immediately.
- **Training**: Complete mandatory safeguarding and Prevent training.

6. Safeguarding Governor

- **Monitoring Role**: Ensures safeguarding is a standing agenda item at board meetings.
- **Challenge & Assurance**: Checks that policies and practices are effective.

7. External Agencies

- **Local Authority Safeguarding Adults Board**: Provides guidance and oversight for adult safeguarding.
- **Police / Social Services**: Handle investigations and interventions when necessary.