



GODALMING
COLLEGE

CHILD PROTECTION AND SAFEGUARDING POLICY

**Learning together
for success and progression**

Child Protection and Safeguarding Policy

Trustee Committee Responsible:	Curriculum and Quality Committee
Trustee Lead	Link Trustee - Safeguarding
Nominated Lead Member of Staff:	Assistant Principal, Safeguarding and Support
Status and Review Cycle:	Annual
Current Review:	July 2026
Next Review Date:	July 2027

Introduction

Godalming College places safeguarding at the heart of our work with young people: all staff and trustees have a moral and statutory responsibility to safeguard and promote the welfare of all students.

In prioritising welfare, all staff and trustees believe in providing a caring, positive, safe and stimulating environment where young people are respected and valued and which promotes the social, physical and moral development of every student. We are alert to the signs of abuse, neglect, exploitation and child-on-child abuse, following our procedures to ensure that students receive effective support, protection and justice. The College will always ensure that the student's wishes and feelings are taken into account and will always act in the best educational interests of the student. We liaise with parents and all relevant services both to promote the welfare of students, aid in protecting them from harm and to secure support from external agencies where appropriate.

We will ensure that all staff members maintain an attitude of 'it could happen here' and feel able to raise concerns either about a young person at risk or a member of staff whose behaviour may present a risk to a student. All staff and trustees recognise their responsibility in doing all that we can to protect our students from harm regardless of age, gender, culture, language, race, ability, sexual identity or religion.

Reporting systems are promoted to students throughout the College and care is taken to ensure that all staff are trained in appropriate disclosure and reporting protocols.

We recognise that:

- students have a right to feel safe and secure and that they cannot learn effectively unless they do
- all students have a right to be protected from harm and abuse
- all staff and trustees have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a young person is at risk of harm, either in the College, online or in the community, taking into account contextual safeguarding, in accordance with statutory guidance
- working in partnership with other agencies protects students and reduces risk and so we will engage in partnership working to protect and safeguard students.

Aims

- To demonstrate the College's commitment with regard to safeguarding and child protection
- To raise the awareness of all staff and trustees of their responsibilities to safeguard students

- To ensure consistent excellent practice across the College
- To provide robust college systems and procedures that are followed by all members of the College community in cases of suspected abuse
- To develop and promote effective working relationships with other agencies, in particular with agencies providing Family Help and other early intervention services
- To establish procedures for reporting and dealing with allegations of abuse against members of staff
- To ensure the safe recruitment of staff

Scope

This policy applies to all students attending Godalming College and to all staff, trustees, volunteers, contractors and visitors working on behalf of the College. In accordance with Keeping Children Safe in Education 2026 (KCSIE), the College recognises its statutory safeguarding responsibilities for all children and young people under the age of 18 and adopts a child-centred approach in all safeguarding practice. The College also acknowledges its wider duty of care to adult learners aged 18 and over and will take appropriate action to safeguard their welfare in line with relevant legislation, including the Care Act 2014, Prevent Duty requirements and College safeguarding procedures. This policy applies to all safeguarding concerns arising within College, online, during educational visits, work placements, and in the wider community where a student's safety or welfare may be affected.

Legislation

This Policy predominantly reflects both statutory guidance 'Keeping Children Safe in Education' 2026 (KCSIE) and Surrey Safeguarding Children Partnership (SSCP) Procedures. The Children Act 1989 places a duty on education providers to take steps to protect children in appropriate circumstances and gives certain powers to the policy so they are able to protect children from abuse.

This policy has also been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, the Children's Wellbeing and Schools Act 2026, the Equality Act 2010 and in line with statutory guidance: 'Working Together to Safeguard Children' 2026, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015, the OFSTED Review of Sexual Abuse and Harassment in Schools and Colleges, 2021, Sexual violence and sexual harassment between children in schools and colleges, 2021, Meeting digital and technology standards in schools and colleges 2023 and Behaviour in Schools guidance, 2024.

Definitions/Terminology

Safeguarding and promoting the welfare of children is defined 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.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Family Help means providing support as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Staff refers to all those working for or on behalf of the College, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child(ren) includes everyone under the age of 18. However, as a College we have safeguarding responsibilities for all learners, including those over 18, under legislation and guidance such as the Care Act 2014, Prevent Duty, and our own internal safeguarding procedures.

Parent(s) refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Looked After Child then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access and the Child Protection Consultation Line. C-SPA is the appropriate terminology for Surrey County Council, but this may vary between local authorities e.g.: Multi Agency Safeguarding Hub or SPoA

DSL refers to the Designated Safeguarding Lead, the person who has the duty to oversee and coordinate safeguarding policies, procedures and act as the point to contact for anyone with safeguarding concerns.

DDSL refers to a Deputy Designated Safeguarding Lead, the College maintains an appropriately trained team of DDSLs. All DDSLs are trained to the same standard as the DSL and support the DSL in operational safeguarding or deputise for the DSL when not in College. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL.

Child on Child abuse refers to any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children and within their relationships, friendships and wider peer associations. It is a safeguarding issue for both victim and alleged perpetrator. Child on Child concerns include harassment and violence. KCSIE Part 5 covers managing child on child sexual harassment and sexual violence.

Roles and Responsibilities

Trustees

The Board of Trustees ensures that the College has appropriate policies and procedures in place to safeguard and protect student welfare. This includes the Child Protection and Safeguarding Policy and the Staff Code of Conduct both of which are updated regularly.

The Safeguarding Link Trustee will take a leading role within the Board in ensuring that the Trustees carry out their responsibilities outlined above. They will report regularly on Safeguarding and Child Protection to the Board.

Senior Leadership Team

The Principal will ensure that policies and procedures, adopted by the Board of Trustees and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

The Assistant Principal – Safeguarding and Support (DSL) takes lead responsibility for safeguarding and child protection in the College.

Safeguarding Team

The Safeguarding Team consists of the DSL and DDSLs, comprised of the following staff: Assistant Principal, Safeguarding and Support, Directors of Safeguarding and Intervention, Senior Tutors, Learning Support Manager, Health and Wellbeing Manager and Student Wellbeing Practitioners. This team is signposted across College and all students and staff are made aware of these members of staff.

DSLs take responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that students in need have experienced and work to identify the impact that these issues might have on student attendance, engagement and achievement at College.

Human Resources

The Human Resources Department is responsible for ensuring that all recruitment and selection processes comply with the safer recruitment requirements set out in Part Three of KCSIE, The Prevent Duty and the Crime and Policing Act 2026. This includes undertaking appropriate pre-employment checks, maintaining the Single Central Record, verifying the suitability of staff, volunteers and contractors, and ensuring that safeguarding considerations are embedded throughout the recruitment process to deter, identify and reject unsuitable applicants.

All Staff

All staff have a duty to safeguard students and a responsibility to keep themselves up to date with the latest guidance. A member of staff who is approached by a student should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals, the DSL in particular, to help keep the student or other students safe. The degree of confidentiality should always be governed by the need to protect the student. It is imperative that the views of the student are listened to carefully and taken seriously.

In addition, all staff are made aware of the barriers to disclosure: students may not feel ready or know how to tell someone that they are being abused, exploited or neglected and may feel embarrassed, humiliated or are being threatened. They may not recognise that their experiences are harmful. Staff should employ their professional curiosity and speak with a member of the safeguarding team if they have concerns about a student. To facilitate communication and disclosure, staff consistently work to build trusted working relationships with students.

Additional consideration needs to be given to students with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who the rest of the College Safeguarding team are, in order to make contact with any safeguarding concern.

Policy Arrangements

We recognise that the College plays a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

As a College we will educate and encourage students to be safe as follows:

- we will promote a caring, safe and positive environment within the College
- ensure that all students know they can access any number of adults in the College whom they can approach if they are worried or in difficulty
- we will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College community
- we will ensure students are taught to understand and manage risk through all aspects of college life. This includes online safety
- include regular consultation with students e.g., through questionnaires, participation in Shaping Futures tutorial activities, etc.
- we will respond sympathetically to any requests for time out to deal with distress and anxiety
- we will offer details of helplines, counselling or other avenues of internal and external support
- we will liaise and work in partnership with agencies involved in providing Family Help and other early intervention services
- we will notify Social Care immediately if there is a significant concern
- we will provide continuing support to a student about whom there have been concerns who leaves the College by ensuring that information is shared under confidential cover to the students' new setting within statutory timescales
- ensure all staff are aware of College guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks

Training for Staff

- All staff, including those who do not work directly with students, must read and understand Part One of KCSIE 2026. If staff need support or clarification with Part One, they should ask the DSL or deputies.
- The DSL and deputies will receive training which gives them the knowledge and skills needed to fulfil their responsibilities and will undertake update training at 2-yearly intervals in line with statutory requirements
- All new members of staff and Trustees will be required to read the College's Child Protection and Safeguarding Policy and procedures during their induction into the College along with relevant safeguarding modules such as Prevent
- All existing staff and Trustees undertake Child Protection and Safeguarding training on an annual basis, to ensure their understanding of the latest updates of Keeping Children Safe in Education. Training for Trustees is focused on the knowledge required to provide strategic challenge ensuring that the safeguarding policies and procedures are effective and support the delivery of a robust whole college approach to safeguarding.

Monitoring and Review

- The Link Trustee reports to the Board through a standing agenda item
- There is an annual Safeguarding self-assessment report, which is reviewed by the Link Trustee
- The College Safeguarding Team meet at least every two weeks
- Safeguarding supervision is in place for all members of the Safeguarding Team
- The Single Central Record is reviewed termly by the Assistant Principal, Safeguarding and Support and annually by the Link Trustee.
- This Policy is reviewed and updated on an annual basis

Referral

We reserve the right to act in the best interests of the young person, and we will always work to include the student in decision making and referrals. Wherever possible this will include working with parents, but we may have to refer to agencies without consulting with parents first. All staff will always undertake to gain parent/carers' consent to refer a student to Social Care unless to do so could put the student at greater risk of harm or impede a criminal investigation. In addition, it is considered legitimate to share information without consent where it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent and, to gain consent, it would place a child at risk.

- We will refer all cases of where a threshold of harm has occurred to the Local Authority, in most cases this will be the C-SPA within Surrey County Council, however given our location, we may need to engage with other local authorities such as Hampshire and West Sussex.
- Refer to the Police if a crime may have been committed or where a crime is being committed will call 999.
- Liaise with agencies providing Family Help and other early intervention services
- Monitor any cases referred to Family Help and consider referral to children's services where the situation does not improve.
- We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting
- We will support such staff by providing an opportunity to talk through their anxieties with a DSL and to seek further support as appropriate

Record Keeping

- All safeguarding concerns and actions are recorded securely and confidentially on CPOMS, ensuring an accurate chronology is maintained and that relevant staff can access information on a need-to-know basis to support the safeguarding of our students.
- An accurate record should be made and kept in accordance with the College's Data Protection Policy.

Confidentiality

All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard students and with due regard to the Data Protection Act 2018 and UK GDPR.

Regulations are not a barrier to sharing information where a failure to do so would place a young person at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a student to keep secrets which might compromise the student's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to students and families. In this respect, they are confidential and the DSLs or Principal will only disclose information about a student to other members of staff on a need-to-know basis. Information relating to a student will only be shared with individuals named as safeguarding contacts on the student record and with the student's consent. However, where there is a risk of harm or another lawful safeguarding basis for sharing information, consent may not be required in line with GDPR and KCSIE. Any member of staff who is unsure about whether information should be shared must seek advice from the DSL or Data Protection Officer (DPO) before doing so.

Dealing with Allegations against Staff

All College staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for work with individual students or parents to be conducted in view of other adults. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that sexual activity between a member of College staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

If an allegation is made, or information is received about a member of staff which suggests that a person may be unsuitable to work with students, the member of staff receiving the allegation or information, will immediately inform the Principal. This information will be recorded. The Local Authority Designated Officer (LADO) will be contacted and relevant guidance followed.

If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Trustees who will consult with the LADO, without notifying the Principal first. The College will follow the Surrey procedures for managing allegations against staff.

Suspension of the member of staff, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO and the HR department in making this decision. In the event of an allegation against the Principal, the decision to suspend will be made by the Chair of Trustees.

Low level concerns, that is, concerns about behaviour towards a student that does not meet the threshold of harm, but that is inconsistent with the Staff Code of Conduct (including inappropriate conduct outside of work) should similarly be reported to the Principal or the DSL. Appropriate policies and processes are in place to manage and record such concerns and to take appropriate action to safeguard children and young people.

Whistleblowing

We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the College's safeguarding arrangements. If it becomes necessary to consult outside the College, they should speak, in the first instance, to the LADO in accordance with the Whistleblowing Policy.

Whistleblowing regarding the Principal should be made to the Chair of the Board of Trustees whose contact details are available to staff.

Child Protection and Safeguarding Issues and Categories

All staff should have an awareness of safeguarding issues that can put learners at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that young people are at risk. Additional information on some of the key safeguarding issues listed below along with information on a wider range of other safeguarding issues is included in Part 1 and Annex A of KCSIE.

Support Before Statutory Intervention

Any young person may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for additional support for a student who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Safeguarding on Campus

The College promotes a safe, secure and supportive learning environment through a whole-college approach to safeguarding. All students are required to carry a valid Student ID Card whilst on site, and all staff are issued with appropriate ID Cards and lanyards, which must be worn and visible at all times. These measures support site security and enable students to readily identify authorised members of staff. Safeguarding is also embedded throughout the student experience, with teachers promoting awareness, wellbeing and personal safety through the curriculum, and pastoral staff providing guidance, support and intervention where needed. Together, these arrangements help to create a positive, respectful and inclusive environment in which students feel safe, supported and able to thrive.

Online Education

Teaching and Learning is delivered in person as outlined in our Behaviour and Support Policy and Procedures, except where there is a necessity to move to online as a result of an exceptional closure. However the College uses an appropriate Virtual Learning Environment (VLE) to assist students in their learning outside of lessons. The College emphasises the importance of a safe online environment for staff and students. The use of online resources for teaching and learning should follow the same principles as set out in the College's Staff Code of Conduct. In addition, it is imperative that staff use the platforms provided by the College for online communication with students. Godalming College will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Should we be forced into online learning, guidance for delivering remote online learning is presented below:

- Appropriate safeguards should be in place for any online lessons and meetings, especially where students are involved
- Live classes should be kept to a reasonable length of time (i.e. length of a lesson, maximum)
- Language must be professional and appropriate, including that of any family members in the background
- Staff and students must wear appropriate clothing for a work and study environment.
- Any computers used should ideally be on a desk or table and, where student use of cameras is appropriate, ideally the background should be blurred
- Additional appropriate safeguards should be in place for any one-to-one meetings that staff have with students via remote learning applications
- Staff must only use platforms provided or approved by Godalming College to communicate with students, i.e. no personal mobile phones or social media applications
- Safeguarding features such as blurring backgrounds should be employed to protect students and staff. Staff will adhere to the College published guidance for the software in use
- Staff should record the outcome, time, date and attendance of any sessions appropriately as would happen with face-to-face one-to-one meetings
- As always, any safeguarding concerns should be reported to the Safeguarding Team

Online Safety

Online safety is a running and interrelated theme within Safeguarding and the College is committed to regularly reviewing its measures for monitoring messaging on College systems and filtering content where appropriate. All staff undergo safeguarding and child protection training which includes online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring of online content. We utilise intelligent filtering software to block harmful content without impacting on Teaching and Learning. Our filtering is applied to college devices and any devices utilising our Wi-Fi. Our monitoring software subscription captures key-strokes and utilises AI technology and human moderators to generate alerts to the Safeguarding Team in response to identified risks.

The Senior Leadership Team and Trustees (as appropriate) regularly review the filtering and monitoring systems and their effectiveness, bearing in mind the age range of students, how they access and use IT systems and the balance of costs versus safeguarding risks, blocking harmful and inappropriate content without unreasonably impacting teaching and learning. Technical requirement for filtering, monitoring and cyber security are compliant with the Internet Watch Foundation (IWF) the UK safer Internet Centre (UKCIS).

Students increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites and for online gaming, which is beyond the control of the College, but staff are aware of the effects this can have on students and will report concerns accordingly. Some adults and other students use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing students to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. The College seeks to build upon the PSHE work done in schools to provide information and promote awareness to both students and parents.

Due regard is paid to ensuring that there are effective online filtering and monitoring systems on the College network and College owned devices in accordance with the [filtering and monitoring standards for schools and colleges](#) which includes reference to the 4 Cs areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The College also ensures that the appropriate level of security protection procedures are in place so that systems are safeguarded and that the procedures are reviewed to keep up with evolving cyber-crime technologies as outlined in the [Cyber security standards for schools and colleges](#). The College also recognises the need for safety considerations and legal responsibilities if anyone in our community chooses to use Generative AI (either teacher-facing or student-facing) can be found at [Generative artificial intelligence in education](#).

Students Missing or Absent from Education

Students who are missing or absent from education can be a warning sign of a range of safeguarding concerns including abuse, neglect, sexual exploitation and criminal exploitation. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a student going missing in future. Staff, students and parents should be aware of the College's Attendance Procedures.

Looked After Children

The most common reason for young people becoming looked after is as a result of abuse and neglect.

The College ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a student's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the student and contact arrangements with birth parents or those with parental responsibility.

The Designated Teacher will act as the key contact for a Looked After Child or a previously Looked After Child during their time at College. The Designated Teacher will meet on a termly basis with the student, their social worker and carers to update a Personal Education Plan.

Students with Special Educational Needs and Disabilities (SEND)

Additional barriers can exist when recognising abuse and neglect for students with SEND. Physical and mental health conditions may cause barriers for reporting concerns and this must be recognised by all staff and Trustees.

The College ensures that extra pastoral support and attention is considered for students with SEND, including appropriate support for communication where appropriate.

Vulnerable Students

The College recognises that safeguarding risks can be amplified by vulnerability, complexity of need or barriers to disclosure. Particular consideration will be given to students who are looked after, previously looked after, living in kinship care arrangements, young carers, those experiencing mental health difficulties, family adversity, discrimination or social exclusion, and students who may be questioning their gender. Staff will be alert to additional vulnerabilities and ensure that appropriate support, early intervention and safeguarding measures are implemented where required.

The College understands that some students may be questioning their gender and that such students can experience bullying, discrimination, isolation or other vulnerabilities. Any safeguarding concerns will be managed in line with KCSIE 2026 and College safeguarding procedures, with the welfare of the young person remaining paramount.

External Visitors

Contractors – where contractors are used, safeguarding requirements are set out in the contract between the College and the external organisation

Visiting Professionals – The College checks the arrangements for visitors to the College, including the education value, the age appropriateness of delivery, DBS checks and suitability of the content of presentations as per the Prevent guidance.

Abuse, Neglect and Exploitation

The following definitions are taken from KCSIE 2026 and 'Working Together to Safeguard Children 2026'. In addition to these definitions, it should be understood that students can also be abused by being sexually exploited, through honour-based abuse, forced marriage or female genital mutilation.

Child on child abuse is addressed through the Student Behaviour and Support Policy and should be read in conjunction with the Safeguarding Policy. All staff should be aware that students can abuse other students and that it can happen both inside and outside of College and online. Even if there are no reports of abuse in College it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to a member of the Safeguarding Team. It is essential that all staff understand the importance of challenging inappropriate behaviours between students that are abusive in nature.

Abuse

Abuse is a form of maltreatment of a student. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. The college recognises that children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

The College recognises that unexplainable and/or persistent absences from education can be a warning sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.

Physical Abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Guidance on sexual violence and sexual harm between children is now contained within Keeping Children Safe in Education.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Far more students are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child on child abuse

The College recognises that it has a duty to create and maintain high standards of behaviour essential to education and do all it can to prevent Child on Child abuse, and we follow the advice and guidance contained within the [Behaviour in Schools - advice for headteachers and staff](#) as appropriate for the sixth form college setting and age of students. This is documented in the Student Behaviour and Support Policy and Procedures.

Staff should be aware that children can abuse other children (often referred to as child-on-child or peer-on-peer abuse), and that it can happen both inside and outside College and online.

Even if staff have not received a report of it, they should not assume that it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to a member of the Safeguarding Team. It is essential that all staff understand the importance of challenging inappropriate behaviours between learners, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for young people and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

The College recognises that harmful sexual behaviour (HSB) exists on a continuum, ranging from inappropriate comments and behaviour through to sexual harassment and sexual violence. The College acknowledges the escalatory nature of misogyny and the risks posed by both misogynistic and misandrist attitudes, language and behaviours. The College adopts a zero-tolerance approach to sexism and gender-based prejudice, recognising that early identification and intervention are essential in preventing harmful sexual behaviour and maintaining a safe, respectful and inclusive environment for all students.

Youth Involved Sexual Imagery

The practice of students sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given students the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful. Youth involved sexual imagery is addressed in a separate policy but should be read in conjunction with the Safeguarding Policy. Youth involved sexual imagery refers to both images and videos where a person under the age of 18:

- creates and shares sexual imagery of themselves with a peer under the age of 18
- shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- is in possession of sexual imagery created by another person under the age of 18.

Sharing Nudes/Semi-Nudes, Sexting and Upskirting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. Sexting among young people can be a common occurrence, where they often describe these incidents as ‘mundane’. Children involved in sexting incidents will be dealt with by the police as victims as opposed to perpetrators, unless there are mitigating circumstances. The DSL should record all incidents of sexting. This should include both the actions taken and the actions not taken, together with justifications. College staff must actively avoid viewing any images. College staff should seek to preserve evidence. In applying judgement to the sexting incident consider the following:

- Significant age difference between the sender/receiver involved
- If there is any external coercion involved or encouragement beyond the sender/receiver.
- If you recognise the child/young person as more vulnerable than is usual.
- If the image is of a severe or extreme nature.
- If the situation is not isolated and the image has been more widely distributed.
- If this is not the first time children/young people have been involved in a sexting act
- If other knowledge of either the sender or recipient may add cause for concern.

If these characteristics present cause for concern then escalate or refer the incident. If not, manage the situation accordingly, recording details of the incident, action and resolution. For further advice the college will use: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people). Upskirting is a criminal offence. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

Radicalisation and Extremism

[The Prevent Duty for England and Wales](https://www.gov.uk/guidance/prevent-duty-for-england-and-wales) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

The Designated Safeguarding Lead (DSL) will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities.

College staff receive training to help identify early signs of radicalisation and extremism. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. The DSL should then follow the safeguarding procedures and refer cases by email to mail preventreferrals@surrey.pnn.police.uk following the Prevent referral process and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

Indicators of Vulnerability to Radicalisation

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- identity crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- personal crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- personal circumstances – migration; local community tensions; and events affecting the student / student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- unmet aspirations – the student may have perceptions of injustice or a feeling of failure
- experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- Special Educational Needs and Disability – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, financial or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to students and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Students who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a student suffering or witnessing domestic abuse. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships, all which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

The College is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey Colleges; where every College day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a student at the College (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for students who are experiencing domestic abuse.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Any concerns that a student is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The College is aware there is a clear link between regular non-attendance at College and CSE. Staff will consider a student to be at potential CSE risk in the case of regular non-attendance at College and make reasonable enquiries with the student and parents to assess this risk.

The DSL will consider the published Surrey Safeguarding Children Partnership guidance and advice when there is a concern that a student is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a student who is being or who is at risk of being sexually exploited.

In all cases, if the DSL identifies any level of concern the DSL should contact the C-SPA and email a Request for Support Form. If a student is in immediate danger the police should be called on 999.

The College is aware that often a student is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the student may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Students also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The College includes the risks of sexual exploitation in the PSHE and SRE curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

CCE, CSE & Gangs

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A student who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of students is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when students are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A student who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a student is being or is at risk of being criminally exploited will be passed without delay to the DSL. The College is aware there is a clear link between regular non-attendance at College and exploitation. Staff will consider a student to be at potential risk in the case of regular non-attendance at College and make reasonable enquiries with the student and parents to assess this risk.

A request for support to the C-SPA will be made when any concern of harm to a student as a consequence of gang activity including student criminal exploitation becomes known. Any member of staff who has concerns that a student may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a student's immediate safety, the Police will be contacted on 999.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in College who are employed or engaged to carry out 'teaching work' in the College, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health, or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

College staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the College's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm, the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at the right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

College staff should never attempt to intervene directly as a college or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151 or email fm@fcdo.gov.uk.

Honour-based Violence

Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have 'one chance' to speak to a student who is a potential victim and have just one chance to save a life.

The College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

Mental Health

The College has a separate Mental Health Strategy and Action Plan, which sets out the College response to helping students with mental health issues along with strong external agency links. We recognise that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken following this policy and informing the DSL through the use of appropriate safeguarding recording systems (CPOMS).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education. 48. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy). The DSL should assess the risk to both the individual student and others in the College, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. The College recognises that we play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. The College also recognises that students might be at highest risk around the College day (for example, immediately after College).

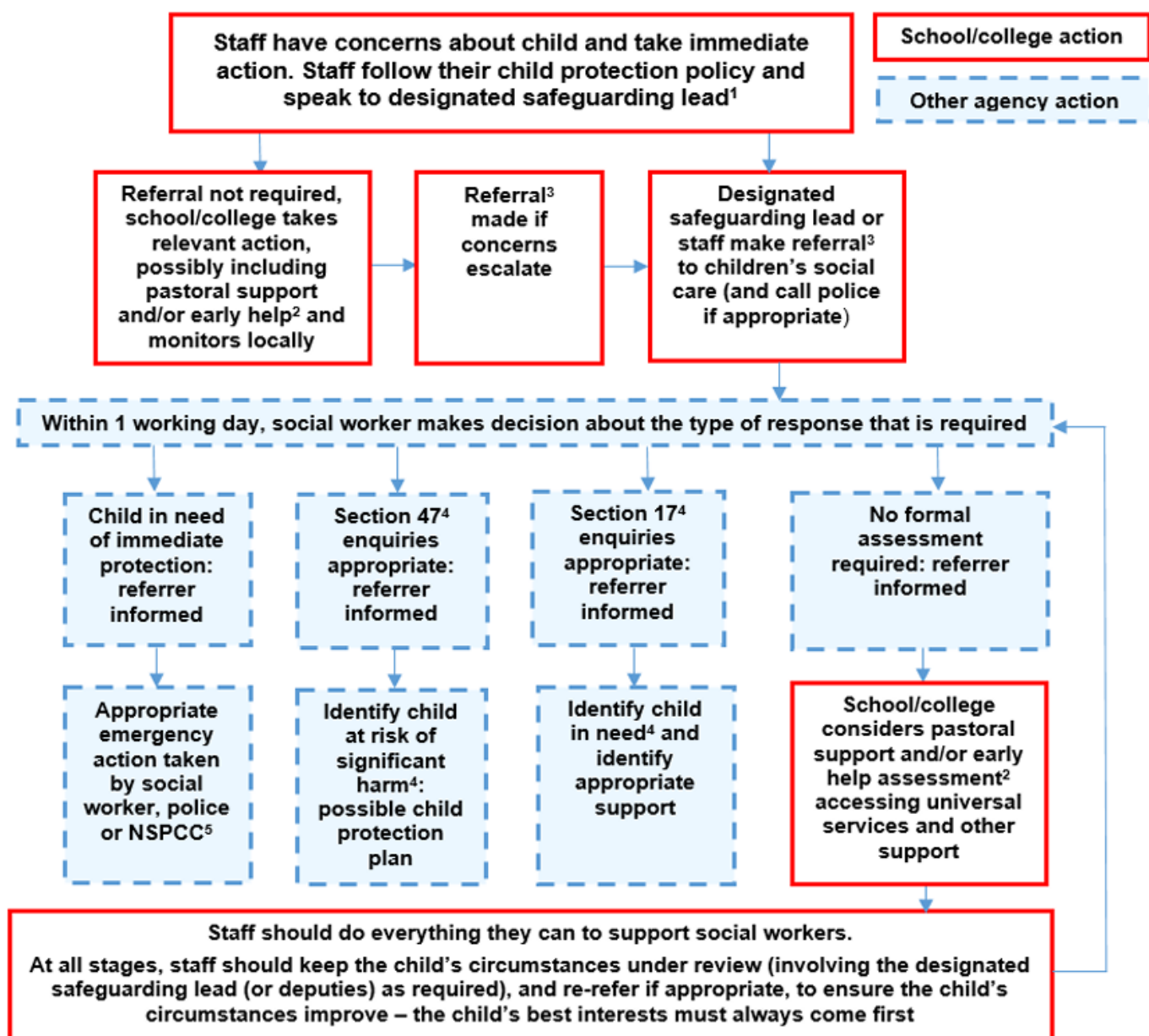
Concerns raised by members of the public

Should a member of the public outside of our College community wish to raise a safeguarding concern, they can do so by emailing safeguarding@godalming.ac.uk. That email address is checked at least once a day, where a student or other member of the College community is at immediate risk of harm, please call 999.

Other relevant policies and documents:

- Student Behaviour and Support Policy
- Student Behaviour and Support Procedures
- Staff Code of Conduct
- Student Contract
- Student Code of Conduct
- Data Protection Policy
- Student IT Acceptable Use Policy

Flowchart setting out the actions taken where there are concerns about a child
(KCSIE 2026)



Handling a Safeguarding Concern

All staff recognise that Safeguarding is everyone's responsibility as set out in the [KCSiE](#) and the [Child Protection and Safeguarding Policy](#). All staff at Godalming are fully committed to the safeguarding of our students and members of the Safeguarding team which include our DSL (Designated Safeguarding Lead) and DDSLs (Deputy Designated Safeguarding Leads) who will liaise with external agencies when necessary.

Taking a disclosure

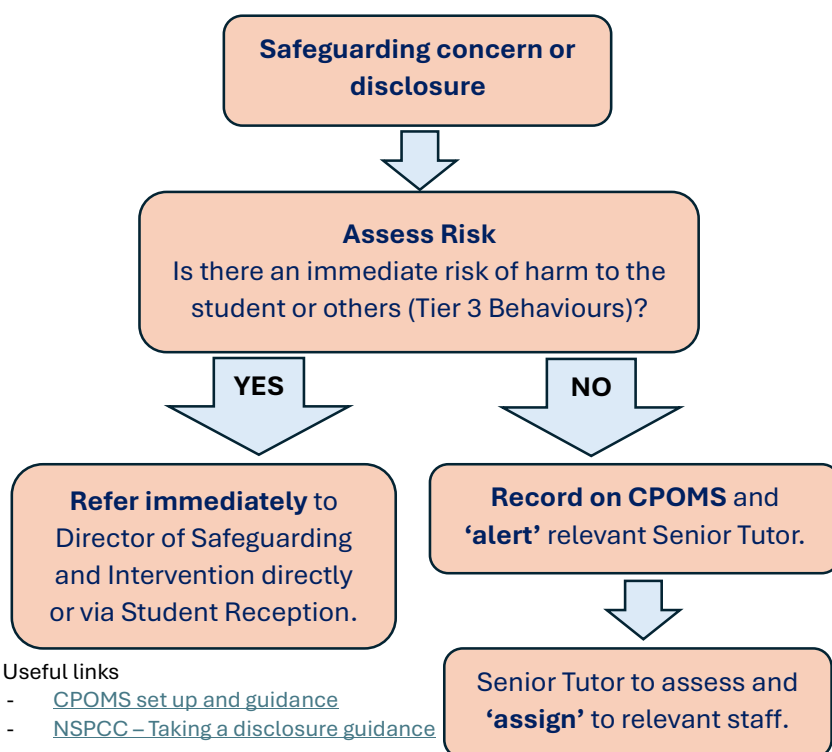
Do:

- Be approachable.
- Listen carefully and trust that what's being said is correct.
- Reflect back key phrases of what's been said, to check your understanding.
- Offer immediate support and reassurance.
- Record a factual account of the conversation immediately, using the student's actual words wherever possible. Sign, date and keep the record safe.
- Log concerns and disclosures on CPOMS
- Explain that you may need to pass the information on to keep them, or other people, safe.
- Ask open questions to clarify what specifically is being disclosed.

Don't:

- Promise confidentiality.
- Panic, overreact, be judgmental or make assumptions.
- Investigate, repeatedly question or ask the individual to repeat the disclosure.
- Try to resolve.
- Make assumptions.

Safeguarding Referral Process



Useful links

- [CPOMS set up and guidance](#)
- [NSPCC – Taking a disclosure guidance](#)

Our DSL

(Designated Safeguarding Lead)

Matt Simpson – Assistant Principal, Safeguarding and Support

Our DDSLs

(Deputy Designated Safeguarding Leads)

Emily Ludford – U6 Director of Safeguarding and Intervention

Ellie MacDonald – L6 Director of Safeguarding and Intervention

Neil Winstone – U6 Senior Tutor

Harry Meyer-Wulff – U6 Senior Tutor

Amy Tidd – L6 Senior Tutor

Dan Grinter – L6 Senior Tutor

Jan Lusty – Learning Support Manager

Luisa Fregapane – Health and Wellbeing Manager

Amy Mallin – Student Wellbeing Practitioner

Jo Shepherd – Student Wellbeing Practitioner (Neurodiversity)

Overview of Safeguarding Provision

Universal Support – Giving advice and signposting Mild or temporary difficulties, support can be provided within universal college support.	Tier 1 - Targeted Support Emerging concerns where support needs are not being met	Tier 2 - Intensive Support Struggling to cope, immediate concerns, range of co-occurring needs	Tier 3 - Risk Support Suffering or likely to suffer significant harm.
Offer of support: Student Assistant Programme, Health and Wellbeing/Safeguarding SharePoint sites, student voice activities, wellbeing week, Shaping Futures tutorial programme, Godalming Skills, counselling service, parent portal, student portal, catering services, Enrichment, Gym.	Offer of support: Possible C-SPA referral, Referral to Learning Support, Referral to Health and Wellbeing, targeted wellbeing courses, Student Assistant Programme, On-site Counselling, Online Counselling	Offer of support: Safeguarding check-ins with Lead Staff Member, Possible C-SPA referral, Referral to Learning Support, Referral to Health and Wellbeing, targeted wellbeing courses, Student Assistant Programme, On-site Counselling, Online Counselling	Offer of support: Safeguarding check-ins with Lead Staff Member, Added to Safeguarding Team Meeting List, Possible C-SPA referral, Referral to Learning Support, Referral to Health and Wellbeing, targeted wellbeing courses, Student Assistant Programme, On-site Counselling, Online Counselling
Lead Staff Member: Personal Tutor, Support Officer The Team Around the Student: Subject Staff, Personal Tutor, Support Officer, Senior Tutor, Learning Support, Student Reception, ILC, Careers Team, EDI Officer, Student Union.	Lead Staff Member: Senior Tutor, Learning Support Manager, Student Wellbeing Practitioner The Team Around the Student: Universal Support plus Student Wellbeing Practitioners, Targeted Learning Support, Police Intelligence, Social Services.	Lead Staff Member: Senior Tutor, Health & Wellbeing Manager The Team Around the Student: Universal Support plus Student Wellbeing Practitioners, Health and Wellbeing Manager, Director of Safeguarding and Intervention, Social Services, Police, Children's Mental and Emotional Wellbeing Team, Private Medical or Mental Health support.	Lead Staff Member: Health & Wellbeing Manager/ Director of Safeguarding and Intervention /AP- Safeguarding and Support The Team Around the Student: Universal Support plus Assistant Principal – Safeguarding and Support, Prevent Liaison Officer.
Possible Behaviours Mild or temporary concerns and/or finding it difficult to adjust to sixth form study e.g. - mild mental health condition which affects their everyday functioning but can be managed within Universal Support - historical concerns but no signs of emerging or immediate risk - sporadic attendance - no planned progression beyond college - struggling to adapt to change - able to demonstrate empathy - feelings of belonging and acceptance - negative sense of self and abilities - lacking confidence in social situations or mild conflict with peers - lack of sleep	Possible Behaviours Emerging concerns that physical and/or psychological health concerns are consistently not addressed e.g. - emerging mental health problems including self-harming behaviour - child on child abuse - bereavement - young carer - emerging eating disorder - signs of substance misuse - very poor personal hygiene - limited/no access to home learning devices - social isolation - housing instability - emerging family issues or domestic violence - engaging in cyber activity that potentially places others or themselves at risk of harm	Possible Behaviours Immediate concerns that physical and/or psychological health concerns are consistently not addressed e.g. - established mental health problems including suicidal ideation - independent living - looked after child - parent/carer neglect - child on child sexual abuse/harassment - established eating disorder - established substance misuse - developing concerns of criminal activity - serious debt/ poverty impacts on ability to meet basic needs - evidence of discriminatory behaviour	Possible Behaviours Urgent concerns that place the student at risk of significant harm e.g. - acute mental health problems, risk of suicide - Acute medical condition causing chronic non-attendance, - seriously obese/underweight, - persistent and high-risk substance misuse, - criminal or sexual exploitation - at risk of FGM - Prevent concerns - domestic abuse or violence of urgent concern - involved in or at risk of serious crime - clear evidence that a family is destitute and/or homeless

Useful link – [Surrey Safeguarding Children Partnership Procedures Manual](#)

Low Level Concerns Procedure

Introduction

Godalming College understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious. The College has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our students and other children. More detailed guidance can be found in KCSiE – Part Four, which also references the following document: Developing and implementing a low-level concerns policy: a guide for organisations which work with children (farrer.co.uk).

Legal framework

This procedure has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE 'Keeping children safe in education – Part Four'
- DfE 'Working Together to Safeguard Children'

This procedure operates in conjunction with the following College policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Behaviour and Support Policy and Procedures
- Whistleblowing Policy
- Data Protection Policy

Definitions

For the purposes of this procedure, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet a threshold of harm or is otherwise not serious enough to consider a referral to the LADO at the time of reporting.

Low-level concerns are differentiated from concerns that can cause harm. In accordance with KCSiE – Part Four, this threshold is defined as accusations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the college understands that many serious safeguarding concerns often begin with low-level concerns. The NSPCC defines Low Level concerns as follows:

A Low Level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the college to refer to the local authority

Low Level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which inadvertently enables harm

Examples of such behaviour could include:

- being over friendly with students
- having favourites
- adults taking photographs of students on their mobile phone
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

Staff will be aware that some of the above incidents may not be concerns in context, e.g. a pre-agreed subject or pastoral one-to-one meeting with a student behind a closed door or an appointment with a college counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to students inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Principal and DSL will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

Roles and responsibilities

The Principal is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.
- Making LADO referrals where appropriate or consult the LADO informally for guidance as required.

The DSL (Assistant Principal, Safeguarding and Support) is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Ensuring that all staff have undertaken safeguarding training.

- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

The Safeguarding Link Trustee and the Chair of Trustees are responsible for:

- Providing impartial advice to the Principal and / or DSL.
- Where appropriate to conduct investigations on behalf of the Principal or if the allegations are made against the Principal or DSL.
- Ensure all relevant policies and procedures are adhered to and are in line with legal framework.

College Culture

The College understands that spotting the early signs of harmful behaviour towards students can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting.

The College will ensure that all staff members have received training as part of their induction along with annual updates for KCSiE, that clarifies appropriate behaviour towards students for staff members in accordance with the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to a member of the Safeguarding Team and any Low-Level concerns or allegations need to be reported to either the Principal or DSL. The College sets clear personal and professional boundaries in an environment where there is respect for all individuals in the College community.

Low Level Concern Procedure

Upon being informed of a behaviour that meets the definition of a Low Level concern, the Safeguarding Lead and/or the Principal will ensure the following:

- **speak to the person who raised the concern** (unless it has been raised anonymously), regardless of whether a written summary has been provided
- **speak to any potential witnesses** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted)
- **speak to the individual about whom the low-level concern has been raised** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted)
- **All relevant information will then be reviewed** to determine whether the behaviour is:
 - entirely consistent with their Staff Code of Conduct and the law
 - constitutes a low-level concern, and is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary,
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies, or
 - in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies

Where they are in any doubt whatsoever, advice will be sought from the LADO - on a no-names basis if necessary

Recording a Low Level Concern:

If it is determined that the behaviour constitutes a Low Level concern, the Low Level Concern Record should be completed and shared with member of staff concerned. In the discussion and meeting and subsequent record, it should

- Be clear to the individual as to why their behaviour is concerning, problematic or inappropriate
- Identify what change is required in their behaviour
- enquire what, if any, support they might need in order to achieve and maintain that
- be clear about the consequences if they fail to reach the required standard or repeat the behaviour in question

Some low-level concerns may also raise issues of Misconduct. The Principal or Safeguarding Lead should also consider whether this is the case - by referring to the Disciplinary Procedure and taking advice from the Director of HR.

KCSIE states that it is for schools and colleges to decide how long they retain records of low-level concerns, but recommends that they are retained at least until the individual leaves their employment. When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims), and a decision made on that basis as to whether it is necessary to keep beyond that time.

References

The College will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the threshold of harm and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met a threshold of harm.

Monitoring and review

This policy will be reviewed annually and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

Low Level Safeguarding Concern Record

Incident [] date []

Report of incident by [staff/student/parent/member of public etc], by email [sent]/online disclosure form, via Safeguarding Team
Summary of Meeting between [senior manager] and staff member (date)
Next Steps/Follow up/Training agreed
Mediation meeting (if appropriate)

Safeguarding Resources Directory

Useful resources are below for all within the Godalming College community, if there is an emergency 999 should be called. The Safeguarding team can be contacted anytime using the email safeguarding@godalming.ac.uk:

[Request for Support Surrey County Council](#)

[Request for Support Hampshire County Council](#)

[Request for Support West Sussex County Council](#)

[Childline](#)

[NSPCC](#)

Below is an organised directory of safeguarding guidance, support organisations and key resources from KCSIE 2026 - Annex A (pp.172-180).

Abuse

- CSA Centre – Signs and indicators of child sexual abuse
<https://www.csacentre.org.uk>
- What to do if you are worried a child is being abused
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Bullying

- Preventing Bullying Including Cyberbullying
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Child Exploitation & County Lines

- Modern Slavery Statutory Guidance
<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>
- County Lines Toolkit
<https://www.childrensociety.org.uk>
- SafeCall
<https://www.missingpeople.org.uk/get-help/safecall>

FGM & Forced Marriage

- FGM Resource Pack
<https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>
- Forced Marriage Guidance
<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

Information Sharing

- Government Information Sharing Advice
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- ICO Data Sharing Hub
<https://ico.org.uk>

Online Safety

- UK Safer Internet Centre
<https://saferinternet.org.uk>
- Childnet
<https://www.childnet.com>
- CEOP Education
<https://www.ceopeducation.co.uk>
- LGfL Online Safety Audit
<https://onlinesafetyaudit.lgfl.net>
- NSPCC Online Safety
<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Radicalisation & Prevent

- Prevent Duty Guidance
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- Educate Against Hate
<https://educateagainsthate.com>

Serious Violence

- Serious Violence Strategy
<https://www.gov.uk/government/publications/serious-violence-strategy>
- Youth Endowment Fund
<https://youthendowmentfund.org.uk>

Sexual Violence & Harmful Sexual Behaviours

- Lucy Faithfull Foundation
<https://www.lucyfaithfull.org.uk>
- Rape Crisis
<https://rapecrisis.org.uk>
- NSPCC HSB Framework
<https://learning.nspcc.org.uk>

Parent Support

- Internet Matters
<https://www.internetmatters.org>
- Parent Zone
<https://parentzone.org.uk>
- Common Sense Media
<https://www.common sense media.org>