

EDA COLLEGE



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Safeguarding Policy¹

Version Control/History

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Designated Safeguarding Lead (DSL)	Manager of Student Services
Deputy DSL	Academic Registrar
Safeguarding Governor	[Named governor to be confirmed]
Next Review Date	August 2026 (or sooner if legislation changes)
Applies To	All staff, students, governors, contractors, visitors and volunteers

EMERGENCY SAFEGUARDING CONTACTS

IF A CHILD OR ADULT IS IN IMMEDIATE DANGER: CALL 999

Designated Safeguarding Lead (DSL): Manager of Student Services [Contact via College office]

Deputy DSL: Academic Registrar [Contact via College office]

Birmingham Children's Services Duty Team: 0121 303 1888 (office hours) 0121 675 4806 (emergency out of hours)

Birmingham Adult Social Care: 0121 303 1234 (office hours) 0121 675 4806 (out of hours)

NSPCC Helpline: 0808 800 5000 (24 hours) help@nspcc.org.uk

¹ In accordance with the Children Act 1989 and 2004, Working Together to Safeguard Children 2023, and Keeping Children Safe in Education 2024 (where applicable)

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1. Introduction and Purpose

EDA College (“the College”) is committed to safeguarding and promoting the welfare of all students, including those who are children (under 18 years of age) and adults at risk of harm. The safety and wellbeing of every member of our community is a fundamental priority that takes precedence over all other considerations.

Although EDA College is primarily a higher education provider for students aged 19 and above, it may enrol students who are under 18 years of age, and it serves a significant number of adult students who may be vulnerable by reason of disability, mental health difficulties, domestic abuse, substance misuse, or other personal circumstances. This policy applies to safeguarding concerns relating to both children and adults.

This policy sets out EDA College’s approach to safeguarding: how we create a safe environment, how we identify and respond to concerns, how we make referrals to statutory agencies, how we manage allegations against staff, and how we ensure that all staff have the knowledge and skills to fulfil their safeguarding responsibilities.

“Safeguarding is everyone’s responsibility. Every member of EDA College’s community — staff, students, governors and volunteers — has a role to play in keeping our community safe. If you have a concern about the welfare of a student, do not wait and do not investigate alone. Share your concern with the Designated Safeguarding Lead immediately.”

IF YOU BELIEVE SOMEONE IS IN IMMEDIATE DANGER — CALL 999 FIRST. Do not wait for the DSL. Do not investigate. Do not delay.

2. Legislative and Regulatory Framework

Legislation / Guidance	Relevance to EDA College
Children Act 1989	Defines the legal framework for child protection; establishes the paramountcy principle (the child’s welfare is paramount); defines categories of abuse
Children Act 2004	Requires agencies to cooperate to safeguard and promote the welfare of children; established Local Safeguarding Children Boards (now replaced by Safeguarding Partnerships)
Working Together to Safeguard Children 2023 (WT2023)	Statutory guidance on inter-agency working to safeguard children; applies to all organisations working with children
Keeping Children Safe in Education 2024 (KCSIE 2024)	Statutory guidance for educational settings; applies to EDA College in respect of any student under 18 and in respect of safer recruitment for all staff
Care Act 2014	Establishes the statutory framework for safeguarding adults at risk; defines who is an ‘adult at risk’ and what constitutes abuse of an adult
Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012	Establish the Disclosure and Barring Service (DBS) barred lists and the regulated activity framework
Counter-Terrorism and Security Act 2015	Prevent duty (addressed in Prevent and Counter-Terrorism Policy — see Section 22 of this policy)
Serious Crime Act 2015	Creates the offence of female genital mutilation and the mandatory reporting duty for FGM (Section 74)
Modern Slavery Act 2015	Creates offences of slavery, servitude and forced or compulsory labour; requires large organisations to publish transparency statements
Domestic Abuse Act 2021	Extended definition of domestic abuse; recognises children as victims of domestic abuse where they witness it; strengthens support for victims

Online Safety Act 2023	Imposes duties on online service providers to protect users from harmful content; relevant to EDA College's online platforms
Equality Act 2010	Safeguarding provision must be delivered in a manner consistent with equality duties; protected characteristics relevant to vulnerability
UK GDPR / Data Protection Act 2018	Governs the processing of personal data in connection with safeguarding; data protection exemptions apply for safeguarding purposes
OfS Regulatory Framework	OfS expects registered providers to have effective safeguarding arrangements as part of their duty of care to students

3. Scope: Who This Policy Applies To

3.1 Who This Policy Protects

- All students enrolled at EDA College, including those under the age of 18 ('children' under the Children Act 1989)
- Adult students who are at risk of harm by reason of disability, mental health difficulties, age, illness, addiction, domestic abuse, or any other personal circumstance that reduces their capacity to protect themselves from abuse or exploitation
- Any child or adult at risk who comes into contact with EDA College through its activities, events or premises

3.2 Who This Policy Binds

This policy applies to every person who works for or on behalf of EDA College in any capacity, including:

- All permanent, fixed-term, part-time and sessional members of staff
- Governors and committee members
- Volunteers and mentors
- Contractors, agency workers and consultants on College premises
- Visiting speakers, external partners and practitioners working with students

EDA College's safeguarding responsibilities extend to the online environment. Safeguarding concerns that arise through the College's VLE, social media channels, email or other digital platforms are subject to the same reporting and response procedures as concerns arising in the physical environment.

4. Definitions

Term	Definition
Child	Any person under the age of 18, regardless of whether they are enrolled on an adult programme. The welfare of a child is always paramount under the Children Act 1989.
Adult at risk	An adult (aged 18 or over) who has needs for care and support (whether or not the local authority is meeting any of those needs), who is experiencing, or is at risk of, abuse or neglect, and who, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it (Care Act 2014, s.42).
Safeguarding	A broader concept than child protection; encompasses all actions taken to promote the welfare of children and adults at risk and to protect them from harm, abuse, neglect and exploitation.
Child Protection	The specific activity undertaken to protect individual children who are suffering, or are likely to suffer, significant harm.
Abuse	A form of maltreatment. A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse can take many forms including physical, emotional, sexual and neglect (see Section 10).

Neglect	The persistent failure to meet a child's or adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.
Designated Safeguarding Lead (DSL)	The senior member of staff with lead responsibility for safeguarding and child protection. At EDA College this is the Manager of Student Services.
Local Authority Designated Officer (LADO)	The officer responsible for managing allegations of abuse made against adults who work with children. EDA College must contact the LADO where an allegation is made against a member of staff.
Child in Need	A child who is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services by the local authority (Children Act 1989, s.17).
Child at Risk of Significant Harm	A child about whom there are reasonable grounds to suspect is suffering, or is likely to suffer, significant harm — the threshold for referral to children's services.
Regulated Activity	Activities that certain individuals are legally prohibited from doing if they are on the DBS barred lists. Working in a position of trust with children constitutes regulated activity.
Disclosure and Barring Service (DBS)	The government agency responsible for managing barred lists and processing DBS checks for individuals working with children or adults at risk.

5. Our Safeguarding Commitments

EDA College commits to:

- Creating and maintaining a safe, supportive and inclusive environment where students feel safe, valued and respected
- Taking seriously all concerns about the welfare of students, however they are raised, and responding promptly and appropriately
- Prioritising the safety and welfare of students above all other considerations, including the reputation of the College or of any individual
- Working in partnership with statutory agencies, including children's services, adult social care, police and the local Safeguarding Partnership, to protect individuals at risk
- Ensuring that all staff are appropriately trained to recognise and respond to safeguarding concerns
- Safer recruitment practices, including DBS checks for all staff and volunteers in regulated activity
- A clear, accessible and effective procedure for reporting and responding to safeguarding concerns
- Supporting students who have experienced abuse or exploitation, recognising that they may need ongoing support
- Maintaining confidential, accurate and proportionate safeguarding records
- Embedding safeguarding into the College's culture, governance and strategic planning
- Reviewing and updating this policy at least annually and whenever there is a change in legislation or statutory guidance

6. The Designated Safeguarding Lead (DSL)

6.1 Role and Responsibilities

The Designated Safeguarding Lead (DSL) is the Manager of Student Services. The DSL is the lead professional for safeguarding and child protection at EDA College and has overall responsibility for the day-to-day operation of this policy. The DSL's responsibilities include:

- Receiving and assessing all safeguarding concerns and referrals from staff, students and others
- Making referrals to children's services, adult social care or the police where the threshold for referral is met
- Liaising with the Local Authority Designated Officer (LADO) where allegations are made against staff
- Maintaining confidential safeguarding records in accordance with this policy and data protection law

- Providing advice, support and challenge to staff who have safeguarding concerns
- Ensuring all staff receive appropriate safeguarding training
- Managing the safer recruitment process, including DBS checks
- Reporting to the Principal and the Academic Board on safeguarding matters
- Attending and contributing to multi-agency safeguarding meetings, including Child Protection Conferences and Child in Need meetings, as required
- Maintaining up-to-date knowledge of safeguarding legislation, guidance and local arrangements

6.2 Deputy DSL

The Deputy DSL is the Academic Registrar. The Deputy DSL is trained to the same level as the DSL and will carry out the DSL's responsibilities in their absence. All staff should know who the DSL and Deputy DSL are and how to contact them.

6.3 Safeguarding Governor

The Academic Board has nominated a Safeguarding Governor who has specific responsibility for providing governor-level oversight of EDA College's safeguarding arrangements. The Safeguarding Governor will:

- Meet with the DSL at least termly to review safeguarding arrangements
- Ensure that the Board receives regular reports on safeguarding activity
- Champion safeguarding at Board level and ensure it is embedded in governance decision-making
- Undertake appropriate safeguarding training for governors

6.4 DSL Training

The DSL and Deputy DSL must complete:

- Level 3 Safeguarding training (or equivalent), refreshed every two years
- Prevent Awareness training (WRAP or equivalent)
- Safer recruitment training
- LADO procedures training
- Annual safeguarding updates via e-bulletins, case studies and sector guidance

7. Safer Recruitment

EDA College is committed to safe recruitment practices that help prevent unsuitable people from working with students. The following safer recruitment measures apply to all appointments:

7.1 Advertising and Application

- All job advertisements will include a statement of the College's commitment to safeguarding and the requirement for DBS checks
- All applicants will be asked to complete a self-declaration of any cautions, convictions, reprimands or final warnings, including those that are 'spent' under the Rehabilitation of Offenders Act 1974 (certain categories of conviction must always be declared for posts working with children)
- Application forms will request information about gaps in employment history, which must be explained

7.2 Shortlisting and Interview

- At least one member of the shortlisting and interview panel must have completed safer recruitment training
- Unexplained gaps in employment history will be explored at interview
- References will be sought directly from referees before appointment; open references will not be accepted
- References will explicitly ask referees whether they have any concerns about the applicant's suitability to work with children or vulnerable adults

7.3 Pre-Employment Checks

The following pre-employment checks are completed for all appointments before the individual commences work:

Check	Applies To	Standard
Enhanced DBS check (with children’s barred list check for regulated activity)	All staff, governors and volunteers who will have contact with students under 18 or adults at risk	Enhanced DBS; barred list check where regulated activity involved
Standard DBS check	Staff in professional services roles with no direct student contact	Standard DBS
Identity verification	All appointees	Passport, driving licence or equivalent photo ID
Right to work in the UK	All appointees	Home Office guidance; documentation verified
Qualifications verification	Academic and professional staff where qualifications are a requirement of the role	Original certificates checked
Professional registration / accreditation (where applicable)	Staff required to hold professional registration as part of their role	Registration verified with the relevant body
References (minimum 2)	All appointees; one reference must be from the most recent employer	Written references; verbal follow-up where concerns arise
Online / social media check	All shortlisted candidates	Proportionate check for publicly available information relevant to the role
Medical fitness for role (where relevant)	Posts with specific physical requirements	Occupational health referral as required

No individual should commence work in a regulated activity with children or adults at risk before the Enhanced DBS check has been returned and assessed as satisfactory, unless a risk assessment has been completed and appropriate supervision arrangements are in place. The DSL must be consulted before any supervised start is authorised.

8. DBS Checks and Barred Lists

8.1 DBS Check Requirements

EDA College uses the Disclosure and Barring Service (DBS) to check the criminal records and barred list status of all staff and volunteers who work with students. The level of check required depends on the nature of the role:

DBS Check Level	Roles	Barred List Check?
Enhanced DBS with Children’s Barred List	All staff with unsupervised access to students under 18; staff in regulated activity with vulnerable adults	Yes — mandatory for regulated activity
Enhanced DBS without Barred List	All other staff with student contact (including all teaching and student-facing professional services staff)	No — unless regulated activity criteria met
Standard DBS	Administrative and operational staff with no direct student contact	No
Basic DBS	Contractors and temporary staff with supervised access only	No — but risk assessment required

8.2 Renewal and Portability

EDA College subscribes to the DBS Update Service. All staff are required to register with the Update Service so that checks can be kept current. Where a new member of staff has a current DBS certificate registered with the Update Service and obtained for a similar role, the College may accept the existing certificate after a status check, subject to the DSL’s assessment.

DBS certificates are not portable between different types of role. A new Enhanced DBS check will be required where an individual moves from a non-regulated to a regulated activity role.

8.3 Overseas Applicants

Where an individual has lived or worked outside the UK, EDA College will request a Certificate of Good Conduct (or equivalent) from the relevant overseas authority in addition to any UK DBS check. The DSL will assess the adequacy of information received from overseas jurisdictions on a case-by-case basis.

8.4 Self-Disclosure and Risk Assessment

Where a DBS check reveals convictions, cautions or other information, the DSL and Principal will conduct a risk assessment to determine whether the individual is suitable to work at EDA College. The existence of a criminal record does not automatically disqualify an individual, but the nature, seriousness, relevance and recency of any offence will be carefully considered. Where an individual is on the Children's or Adults' Barred List, they may not be engaged in regulated activity under any circumstances.

9. Recognising Abuse and Neglect

All EDA College staff have a responsibility to be alert to signs that a student may be experiencing abuse or neglect, or may be at risk of harm. Staff are not expected to be experts in child protection or adult safeguarding — but they are expected to know what to look for and what to do if they have a concern.

Abuse and neglect can take many forms. They may be perpetrated by a parent, family member, partner, friend, peer, stranger, or by a person in a position of trust (including a member of staff). They may occur in the home, in the community, online, or at the College itself. They may affect anyone — children and adults, men and women, people from all backgrounds and communities.

You do not need to be certain that abuse is occurring before raising a concern. If you have a nagging feeling that something is wrong, trust your instincts. It is always better to raise a concern that turns out to be unfounded than to fail to report something that results in harm to a student. The DSL will assess the concern and determine the appropriate response.

10. Categories of Abuse

10.1 Physical Abuse

Physical abuse involves causing physical harm to a child or adult, including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical abuse may also be caused when a parent or carer fabricates or induces illness in a child (formerly known as 'Munchausen syndrome by proxy' or 'fabricated or induced illness').

10.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or adult such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include threats of harm or abandonment, humiliation, blaming, controlling, intimidation, coercion, exploitation, and preventing participation in normal social interaction.

10.3 Sexual Abuse

Sexual abuse 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 they are aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrating acts. It may also include involving children in looking at or producing sexual images, or engaging in sexual activities online.

Sexual abuse of an adult involves any sexual act carried out without consent, or where consent is obtained through coercion, manipulation or exploitation of a position of power. Sexual abuse by a person in a position of trust (e.g. a member of staff) is always a serious matter.

10.4 Neglect

Neglect is the persistent failure to meet a child's or adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. For children, neglect may involve a parent or carer failing to provide adequate food, clothing or shelter; failing to protect a child from physical or emotional harm or danger; failing to ensure access to medical care; or neglecting a child's basic emotional needs.

10.5 Financial or Material Abuse (Adults at Risk)

Financial abuse includes theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs, misappropriation of property, possessions or benefits, and the exploitation of an adult’s resources for the benefit of another.

10.6 Psychological or Emotional Abuse (Adults at Risk)

Includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, and unreasonable and unjustified withdrawal of services or supportive networks.

10.7 Discriminatory Abuse

Abuse motivated by, or resulting in, discrimination on the basis of a protected characteristic, including race, religion, sex, disability or sexual orientation. Hate crime directed at a student may also constitute discriminatory abuse.

10.8 Organisational or Institutional Abuse

Mistreatment or abuse of a child or adult by a regime or practice within an institution. EDA College must be alert to the possibility that institutional practices could themselves constitute safeguarding concerns.

10.9 Self-Neglect

A wide spectrum of behaviour whereby an adult neglect to care for their personal hygiene, health or surroundings. It includes behaviour such as hoarding.

11. Indicators of Abuse or Concern

The following are indicators that a student may be experiencing abuse or neglect, or may be at risk of harm. No single indicator is necessarily conclusive, and many may have innocent explanations. Staff should consider the whole picture and share any concern with the DSL, even if they are not certain.

See Appendix C for the Quick Reference Indicators guide, suitable for printing and keeping accessible. The indicators below are illustrative, not exhaustive.

Category	Possible Indicators
Physical	Unexplained injuries, bruising in unusual locations, burns or scalds, injuries inconsistent with the explanation given, flinching when touched, wearing clothing that conceals injuries
Emotional / Behavioural	Sudden changes in behaviour or academic performance; anxiety, depression or withdrawal; extreme compliance or fearfulness; aggression or challenging behaviour; self-harm or suicidal ideation; eating disorders or significant weight changes
Neglect	Poor hygiene or appearance; always hungry; fatigue or exhaustion; clothing inappropriate for the weather; failure to attend medical appointments; untreated medical conditions
Sexual	Age-inappropriate sexual knowledge or behaviour; sexually explicit drawings or writing; pregnancy in a young person where the circumstances are unclear; disclosure of sexual abuse or exploitation; unexplained gifts or money
Domestic abuse	Flinching or fearfulness in relation to a partner or family member; injuries; controlling behaviour by a partner; disclosures of violence at home; unexplained absences
Exploitation	Unexplained gifts, money or new possessions; association with older individuals or unknown adults; staying out overnight; signs of drug misuse; withdrawal from normal activities; evidence of gang involvement
Online harm	Distress following online activity; secretive use of devices; withdrawal from real-world relationships; explicit content on devices; older ‘friends’ known only online
Forced marriage / HBA	Talk of imminent or recent travel abroad; request for a note of absence or leave of absence; expression of fear about returning home; change in demeanour after a holiday; not returning after a break
FGM	A girl under 18 mentions FGM; references to a ‘special procedure’ or ‘cutting’; pain in the pelvic area; extended absence following a holiday; medical evidence of FGM

General welfare	Disclosure of abuse by the student themselves; disclosure by a third party; professional gut feeling that something is wrong
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12. Responding to a Disclosure

A disclosure occurs when a student tells a member of staff — directly or indirectly — that they are experiencing or have experienced abuse or harm. Disclosures can be unexpected and distressing for both the student and the member of staff. The way in which a disclosure is received can have a significant impact on the student's willingness to seek further help.

12.1 Responding Well

DO	DO NOT
Listen carefully and calmly	Promise confidentiality — you cannot keep this promise
Stay calm and reassuring	Express shock, horror or disbelief
Tell the student they have done the right thing in telling you	Press for more information or ask leading questions
Use open questions where clarification is needed (e.g. 'Can you tell me more about that?')	Investigate the concern yourself
Explain that you will need to share what has been told to you with the DSL	Confront the alleged perpetrator
Take what the student says seriously	Make promises you cannot keep (e.g. 'I won't tell anyone')
Report to the DSL as soon as possible — ideally the same day	Leave the student without informing them of next steps
Record the disclosure in the student's own words as soon as possible after the conversation	Allow your personal feelings or judgements to influence your response

12.2 Recording a Disclosure

Following a disclosure, the staff member must:

- Write a factual account of what the student said, using the student's own words as far as possible, as soon as possible after the disclosure (ideally within one hour and no later than the same day)
- Record the time, date, location and any other people present
- Sign and date the record
- Pass the written record to the DSL without delay
- Not share the information with anyone other than the DSL

Do NOT record information about a disclosure on a shared computer system or in a general student file. Written records of safeguarding disclosures must be passed to the DSL and held in the secure, confidential safeguarding file. Do not discuss the disclosure with colleagues.

13. Reporting and Referral Procedure

13.1 Internal Reporting

Any member of staff, student, governor or contractor who has a safeguarding concern must report it to the DSL (or Deputy DSL if the DSL is unavailable) without delay. The following steps apply:

Step	Action	Timescale
1	ENSURE SAFETY: If there is immediate risk of harm to the student or others, call 999 first. Ensure the immediate safety of anyone at risk.	Immediately
2	CONTACT DSL: Contact the DSL (or Deputy DSL) verbally as soon as possible. If the DSL is unavailable, contact the Principal.	Same day; immediately if urgent
3	COMPLETE REFERRAL FORM: Complete the Safeguarding Concern / Referral Form (Appendix A) and pass to DSL. Use the student's own words where a disclosure has been made.	Within 1 hour of verbal report; same day at latest
4	DSL ASSESSMENT: The DSL reviews the concern and decides on the appropriate course of action: no further action (with reasons), monitoring and support, referral to statutory services.	Within 24 hours of receipt
5	EXTERNAL REFERRAL: Where the threshold for referral is met, the DSL contacts Birmingham Children's Services (for under-18s) or Birmingham Adult Social Care (for adults at risk).	Same day where urgent; within 24 hours otherwise
6	POLICE REFERRAL: Where there is reason to believe a criminal offence has been committed, the DSL contacts the police (999 if urgent; 101 if non-urgent).	Same day; immediately if urgent
7	FEEDBACK: The DSL informs the referring member of staff of the action taken, to the extent that confidentiality allows.	Within 24 hours of decision
8	RECORD: All actions are recorded in the College's secure safeguarding records.	Same day

13.2 Referral to Statutory Services – Thresholds

Concern Level	Threshold	Action
Level 1 — Early Help	Student needs support but does not meet the threshold for statutory intervention; risk of harm if no action taken	DSL arranges early help support; involves Personal Academic Tutor; makes referral for early help services where available; reviews regularly
Level 2 — Child / Adult in Need	Student has needs that require assessment and intervention from children's services or adult social care, but is not at immediate risk of significant harm	DSL makes a referral to Birmingham Children's Services (s.17) or Adult Social Care under the Care Act 2014; cooperates with assessment
Level 3 — Child / Adult at Risk of Significant Harm	Student is suffering or likely to suffer significant harm; threshold for s.47 (children) or adult safeguarding enquiry	DSL makes urgent referral to children's services or adult social care; informs police where a criminal offence may have been committed; attends multi-agency meetings as required
Level 4 — Immediate Danger	Student or others are in immediate danger of harm	Call 999 immediately; inform DSL simultaneously; follow emergency procedures

13.3 Referrals Overruled by DSL

Where a staff member believes a safeguarding concern requires a statutory referral but the DSL decides not to refer, the staff member has the right to contact children's services or adult social care directly to discuss their

concern. No member of staff should be deterred from making a referral by the DSL’s decision not to refer — the welfare of the student is always paramount.

14. Multi-Agency Working

EDA College is committed to working in effective partnership with statutory safeguarding agencies. The DSL will:

- Cooperate fully with any assessment, investigation or conference initiated by Birmingham Children’s Services or Birmingham Adult Social Care
- Attend and contribute to Child Protection Conferences, Child in Need meetings, and Adult Safeguarding meetings as required
- Share information with statutory agencies in accordance with the legal gateways for information sharing in safeguarding contexts
- Implement any action required of the College in a Child Protection Plan or Adult Safeguarding Plan
- Maintain contact with the allocated social worker for any student who is subject to a Child Protection Plan or who is a Looked After Child
- Participate in Serious Case Reviews, Domestic Homicide Reviews and Safeguarding Practice Reviews as required

Partner	Contact / Role	EDA College’s Engagement
Birmingham Children’s Services	0121 303 1888 (office hours) 0121 675 4806 (emergency)	Referrals for students under 18; s.17 and s.47 assessments; Child Protection Conferences
Birmingham Adult Social Care	0121 303 1234 (office hours) 0121 675 4806 (out of hours)	Referrals for adults at risk; Care Act assessments; adult safeguarding enquiries
West Midlands Police	999 (emergency) / 101 (non-emergency)	Criminal referrals; MASH (Multi-Agency Safeguarding Hub) liaison; Prevent duty
Local Authority Designated Officer (LADO)	Via Birmingham Children’s Services	Managing allegations against staff; all staff allegations must be referred to LADO
Multi-Agency Safeguarding Hub (MASH)	Via Birmingham Children’s Services	Threshold decisions; information sharing; coordinated response
Birmingham Safeguarding Children Partnership	Via Birmingham City Council	Local safeguarding strategy; training; serious case review process
NSPCC	0808 800 5000	Advice; resources; national reporting

15. Safeguarding Adults at Risk

EDA College’s safeguarding responsibilities extend to adult students who may be at risk of abuse or neglect by reason of their care and support needs. The Care Act 2014 establishes the framework for safeguarding adults at risk, and EDA College will work within this framework to protect adult students.

15.1 Who Is an Adult at Risk?

An adult at risk is a person aged 18 or over who:

- Has needs for care and support (whether or not those needs are being met by the local authority)
- Is experiencing, or is at risk of, abuse or neglect
- As a result of those needs, is unable to protect themselves against the abuse, neglect or risk of it

EDA College’s student community includes a number of adults who may meet this definition, including students with significant mental health difficulties, students with learning disabilities, students with physical disabilities, students experiencing domestic abuse, and students with substance misuse issues.

15.2 Adult Safeguarding Process

Where a concern arises about an adult student at risk, the DSL will:

- Discuss the concern with the student, where it is safe and appropriate to do so, to understand their wishes and any consent issues
- Assess the urgency of the risk and take any immediate protective action required
- Consider whether to make a referral to Birmingham Adult Social Care under s.42 of the Care Act 2014
- Liaise with the student's GP, mental health team or other relevant support services as appropriate
- Record all actions and decisions in the College's safeguarding records

For adults at risk, the principle of 'making safeguarding personal' applies: the adult's own wishes, views and consent should be central to the safeguarding response, unless there is reason to believe they lack capacity to make decisions or that seeking their consent would put them or others at greater risk.

16. Domestic Abuse

The Domestic Abuse Act 2021 defines domestic abuse as physical, emotional, controlling, coercive, or economic abuse between people aged 16 and over who are, or have been, personally connected. Children who see, hear or experience the effects of domestic abuse are also victims.

EDA College recognises that domestic abuse affects students across all backgrounds and that it may significantly impact on a student's ability to engage with their studies. The College's response to domestic abuse includes:

- Staff training on recognising signs of domestic abuse
- A non-judgemental and supportive response to disclosures
- Referral to the DSL for all domestic abuse concerns involving students
- Referral to local domestic abuse services (e.g. Birmingham and Solihull Women's Aid) where appropriate and with the student's consent
- Consideration of safety planning with the student, in consultation with specialist domestic abuse services
- Flexibility in academic arrangements (attendance, deadlines, resits) for students affected by domestic abuse
- Referral to statutory services where there is a child in the household who may be at risk

Useful contacts: Birmingham and Solihull Women's Aid: 0808 800 0028 (24 hours). National Domestic Abuse Helpline: 0808 2000 247 (24 hours). Men's Advice Line: 0808 801 0327. Galop (LGBT+ domestic abuse): 0800 999 5428.

17. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in the United Kingdom under the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015). FGM constitutes child abuse where it is carried out on a girl under 18 years of age, and it is also a serious harm to adult women.

17.1 Mandatory Reporting Duty

Under s.74 of the Serious Crime Act 2015, a teacher (or other regulated professional) in England who discovers that an act of FGM appears to have been carried out on a girl under 18 must report this to the police. This is a personal duty on the individual professional — it cannot be discharged by referring the concern to the DSL alone. EDA College staff who discover evidence of FGM on a student under 18 must:

1. Contact the police directly (999 if the student is in immediate danger; 101 otherwise)
2. Inform the DSL as soon as possible
3. Record the disclosure and the actions taken

17.2 Indicators of FGM Risk

- A girl mentions that she is going to have a 'special procedure' or knows of others who have
- A student is from a community in which FGM is practised and is about to travel abroad, particularly in school holiday periods
- A student requests an extended or sudden absence

- A student returns from a holiday abroad and seems different — withdrawn, fearful, in pain
- A student discloses that FGM has happened to her or to a family member

17.3 Responding to FGM Concerns

All FGM concerns (risk and disclosure) must be referred to the DSL without delay. The DSL will decide on the appropriate referral to children's services or police. Do not discuss the concern with the student's family before taking advice from the DSL.

18. Honour-Based Abuse (HBA) and Forced Marriage

Honour-based abuse (HBA) is a crime or incident committed to protect or defend the perceived 'honour' of a family or community. Forced marriage (marrying someone without their full and free consent) is illegal in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

EDA College recognises that HBA and forced marriage can affect students of any gender, age, ethnicity or religion. Indicators may include:

- A student expressing fear about returning home or about what will happen to them after a College event or holiday
- Talk of an arranged marriage to which the student has not consented
- A student going missing, being withdrawn, or not returning after a break
- Family members making enquiries about a student's whereabouts, timetable or relationships
- Unexplained request for a letter confirming the student's status or travel documents

All HBA and forced marriage concerns must be referred to the DSL immediately. The DSL will liaise with the Forced Marriage Unit (FMU: 020 7008 0151) and West Midlands Police as appropriate. Staff must not attempt to involve the student's family or community in resolving the concern, as this could place the student at greater risk.

Never approach the family where HBA or forced marriage is suspected. Doing so can significantly increase the risk to the student. Refer immediately to the DSL who will seek specialist guidance.

19. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE) is a form of sexual abuse in which children are sexually exploited for money, power or status. Child Criminal Exploitation (CCE) occurs where children are exploited to commit crimes, often including drug trafficking, theft or violence.

Both CSE and CCE can be difficult to identify because children may not recognise themselves as victims and may appear to participate willingly. Indicators include:

- Unexplained gifts, new possessions or money
- Associating with older individuals or unknown adults
- Going missing or staying away from home overnight
- Secretive use of technology or social media
- Signs of physical or emotional abuse
- Drug or alcohol misuse
- Withdrawing from College, family or existing friends
- Evidence of self-harm

All CSE and CCE concerns must be referred to the DSL immediately. The DSL will refer to Birmingham Children's Services and / or West Midlands Police as appropriate.

20. County Lines

County lines is a term used to describe criminal networks that exploit children and vulnerable adults to move and sell drugs across county boundaries. County lines exploitation is a form of CCE. Indicators may include:

- Travelling frequently to other areas without explanation
- Being in possession of multiple mobile phones
- Receiving unexplained calls or messages
- Being controlled or threatened by others

- Unexplained absences; poor engagement with education
- Signs of physical harm or intimidation

Any county lines concern must be referred to the DSL immediately, who will refer to West Midlands Police and Birmingham Children's Services or Adult Social Care as appropriate.

21. Online Safety and Technology

EDA College recognises that the online environment presents significant safeguarding risks as well as educational opportunities. The College's approach to online safety includes:

- Content filtering on College IT systems to block access to harmful content
- Network monitoring to identify safeguarding-related online activity
- An IT Acceptable Use Policy that sets out expected behaviour online
- Awareness-raising for students and staff about online safety risks
- Procedures for responding to safeguarding concerns that arise online, including cyberbullying, online sexual harassment, grooming, and access to radicalisation or extremist content

Safeguarding concerns arising from online activity are subject to the same reporting and response procedures as concerns arising in the physical environment. If a student discloses that they are being groomed, harassed or exploited online, the DSL must be informed immediately.

Staff must not use personal devices to contact students and must not connect with students on personal social media accounts. All communication with students must be through official College channels.

Where a member of staff discovers illegal images (including child sexual abuse material) on a College device or network, they must not attempt to view, download, share or delete the material. They should immediately report to the DSL and IT Manager, and the matter will be referred to the police without delay.

22. Prevent and Radicalisation

Protecting students from the risk of radicalisation is part of EDA College's wider safeguarding duties. The College's approach to Prevent is set out in full in the Prevent and Counter-Terrorism Policy (EDA-POL-PRV-001). The Prevent duty and this safeguarding policy work together to protect vulnerable students from harm.

The Prevent Lead at EDA College is the Principal. The DSL and the Prevent Lead will work closely together where a concern has both safeguarding and radicalisation dimensions. All Prevent referrals involving a child under 18 must also be considered through a safeguarding lens.

23. Managing Allegations Against Staff

EDA College takes seriously any allegation that a member of staff, volunteer, governor or contractor has behaved in a way that has harmed a child or adult at risk, may have harmed a child or adult at risk, or has committed a criminal offence against or related to a child or adult. Such allegations must be handled carefully and in accordance with statutory guidance.

23.1 Reporting an Allegation

Any allegation or concern about the behaviour of a member of staff toward a student must be reported to the Principal immediately. Where the allegation is about the Principal, it must be reported to the Chair of the Academic Board.

23.2 Initial Action

On receipt of an allegation, the Principal (or Chair, if the allegation is about the Principal) will:

- Take any immediate action necessary to ensure the safety of students
- Contact the Local Authority Designated Officer (LADO) within one working day to discuss the allegation
- Not investigate the allegation or take any action that could prejudice a police investigation
- Consider whether to suspend or redeploy the member of staff pending investigation, based on a risk assessment and LADO advice
- Inform the member of staff of the allegation and the fact that the LADO has been contacted, unless police advise against this
- Support the member of staff through the process (separate from any investigation)

23.3 The Role of the LADO

The LADO (Local Authority Designated Officer) manages allegations against adults who work with children. The LADO's role includes:

- Providing advice and guidance to EDA College on how to manage the allegation
- Coordinating the involvement of police and children's services where required
- Chairing strategy meetings
- Overseeing the investigation and its outcome

Birmingham LADO contact: 0121 303 1888 (ask for the LADO). All allegations against staff that meet the threshold must be referred to the LADO within one working day.

23.4 Record Keeping and Outcome

All allegations, referrals and investigation records will be retained in accordance with this policy's record-keeping provisions (Section 25). Regardless of the outcome of an investigation, a record of the allegation will be retained until the individual reaches the normal retirement age or for 10 years, whichever is longer, in accordance with statutory guidance.

EDA College will not enter into a compromise agreement (now 'non-disclosure agreement') that prevents the disclosure of information relevant to a safeguarding concern. Such agreements in relation to safeguarding matters are contrary to public policy and may be unlawful.

24. Confidentiality and Information Sharing

EDA College recognises that safeguarding information is highly sensitive and must be handled with care. The following principles apply:

- Safeguarding information will be shared only on a 'need to know' basis: with the DSL, relevant statutory agencies, and (where appropriate) the student's Personal Academic Tutor
- The student's consent will be sought before information is shared with third parties, wherever it is safe and appropriate to do so
- Where consent cannot be obtained, information may still be shared where the welfare of the student or others requires it — the safety of the child or vulnerable adult takes precedence over confidentiality
- Staff must not promise confidentiality to students who are making a safeguarding disclosure
- Information shared in a safeguarding context is exempt from certain data protection requirements under the Data Protection Act 2018
- All safeguarding information sharing decisions will be documented, including the basis for the decision

EDA College applies the seven golden rules of information sharing set out in the Information Commissioner's guidance:

4. The GDPR and Data Protection Act 2018 do not prevent you from sharing information when the safety of an individual is at risk
5. Be open and honest with the individual about how and why their information will be shared, unless unsafe or counterproductive to do so
6. Seek consent where appropriate, but remember that it is not always required
7. Consider safety and wellbeing: base your decision on whether sharing is necessary to protect someone
8. Necessary, proportionate and relevant: share only what is needed
9. Accurate and up to date: check information before sharing
10. Record and be accountable: document your decision and the reasons

25. Record Keeping

EDA College maintains confidential, accurate and proportionate safeguarding records. All safeguarding concerns, referrals, actions and outcomes are recorded in the College's secure safeguarding files. The following standards apply:

- Safeguarding records are held separately from general student files and are accessible only to the DSL, Deputy DSL and Principal

- Records are stored securely, whether held in paper or electronic format
- Records include: the nature of the concern; the date and time it was reported; the actions taken and by whom; the rationale for decisions (including decisions not to refer); referrals made and to whom; outcomes; and any further monitoring or support agreed
- Safeguarding records relating to a child must be retained until the child reaches the age of 25 (or, where the case is particularly serious, indefinitely)
- Safeguarding records relating to adults at risk must be retained for a minimum of seven years
- Records of allegations against staff must be retained until the individual reaches normal retirement age or for 10 years, whichever is longer
- Where a student transfers to another institution, the DSL will consider whether to transfer safeguarding records to the receiving institution, in accordance with statutory guidance
- Safeguarding records will be disposed of securely at the end of the retention period

26. Training and Competence

Training	Audience	Frequency	Standard
Safeguarding awareness training (mandatory)	All staff, governors and volunteers	On joining; refreshed annually	Awareness of: types of abuse; signs of concern; reporting procedure; this policy
Designated Safeguarding Lead training	DSL and Deputy DSL	On appointment; refreshed every 2 years	Level 3 safeguarding training; LADO procedures; multi-agency working; updated annually via e-bulletins
Safer recruitment training	At least one member of every recruitment panel	On taking up the role; refreshed every 5 years	Safer Recruitment in Education or equivalent
Prevent awareness (WRAP)	All staff	On joining; annually	Home Office WRAP e-learning or face-to-face equivalent
Domestic abuse awareness	All student-facing staff	On joining; every 2 years	Awareness training; referral pathways
Online safety awareness	All staff	On joining; annually	Identifying online safeguarding risks; reporting; IT Acceptable Use Policy
FGM awareness	All student-facing staff	On joining; every 2 years	Legal duty; recognition; mandatory reporting
Governor safeguarding training	All governors	On appointment; annually	Governor-level awareness; Board accountability

Training completion is recorded by the Academic Registrar and reported to the DSL and Academic Board annually. Staff who do not complete mandatory safeguarding training within the required timescale may have their access to student-facing activities reviewed.

27. Student Support and Wellbeing

EDA College recognises that students who have experienced abuse or exploitation may need ongoing support that goes beyond the immediate safeguarding response. The following support is available:

- Personal Academic Tutor (PAT): all students have a named PAT who can provide pastoral support and refer students to additional services
- Manager of Student Services: provides direct student welfare support and coordinates access to specialist services
- Mental health and wellbeing referrals: the College will signpost and facilitate referrals to appropriate mental health services, including NHS services, Birmingham and Solihull Mental Health NHS Foundation Trust, and voluntary sector providers
- Flexible academic arrangements: the DSL and Vice Principal (Academic) may agree flexible attendance, deadline extensions, or other academic adjustments for students who have experienced trauma
- Domestic abuse support: referral to local and national specialist domestic abuse services
- Community and faith-based support: where appropriate, referral to community or faith-based organisations that can provide culturally specific support
- Emergency accommodation: signposting to local housing and emergency accommodation services where a student is at risk at home

EDA College will continue to support students throughout and after any statutory safeguarding process, recognising that formal intervention is not the end of the support relationship. The DSL will coordinate the College's support response and will review it regularly.

28. Monitoring, Review and Governance

Activity	Lead	Frequency	Reported To
Annual policy review	DSL / Principal	Annual (August)	Academic Board
Annual safeguarding report to Board	DSL	Annual	Academic Board
Safeguarding Governor meeting with DSL	DSL + Safeguarding Governor	Termly	Safeguarding Governor reports to Board
Staff safeguarding training completion	Academic Registrar / DSL	Annual	Academic Board
DBS check register review	Academic Registrar / DSL	Annual; and when new staff join	DSL
Safer recruitment records review	Academic Registrar / DSL	Annual	DSL
Safeguarding referral log review (anonymised)	DSL	Termly	Principal
Multi-agency engagement review	DSL	Annual	Principal
LADO case outcomes review	DSL	Following each case	Principal and Academic Board (via Safeguarding Governor)
OfS regulatory compliance review	Academic Registrar / Principal	Annual	Academic Board

The Academic Board has ultimate accountability for EDA College's safeguarding arrangements. The Board receives an annual safeguarding report and ensures that safeguarding is embedded in the College's culture, governance and strategic planning. The Safeguarding Governor provides an important bridge between the DSL and the Board.

Appendix A: Safeguarding Concern / Referral Form

Complete this form for every safeguarding concern and pass it to the DSL as soon as possible after the verbal report. This form is STRICTLY CONFIDENTIAL. Do not leave it unattended or share it with anyone other than the DSL.

SECTION A: YOUR DETAILS	
Your name and role	
Date and time of concern / disclosure	
Date and time of this report	
Location where concern arose	
SECTION B: STUDENT DETAILS	
Student name	
Student ID number	
Date of birth / age	
Programme of study	
Is the student under 18?	Yes / No
Is the student an adult at risk?	Yes / No / Unknown
Emergency contact (if known and safe to contact)	
SECTION C: NATURE OF CONCERN	
Type of concern (please tick):	<input type="checkbox"/> Physical abuse <input type="checkbox"/> Emotional abuse <input type="checkbox"/> Sexual abuse <input type="checkbox"/> Neglect <input type="checkbox"/> Domestic abuse <input type="checkbox"/> CSE / CCE <input type="checkbox"/> FGM <input type="checkbox"/> HBA / Forced marriage <input type="checkbox"/> County Lines <input type="checkbox"/> Radicalisation / Prevent <input type="checkbox"/> Online harm <input type="checkbox"/> Other (describe below): <input type="checkbox"/> Unknown / general welfare concern
Please describe the concern in full. Use the student's own words where a disclosure was made. Do not speculate or interpret — record facts only.	
Who is the alleged perpetrator (if known)?	Name (if known): Relationship to student: Is the alleged perpetrator a member of EDA College staff? Yes / No
Is there an immediate risk to the student or others?	Yes / No If YES, have you called 999? Yes / No Time of 999 call (if made):
Has this concern been raised before?	Yes / No If yes, when and what action was taken?
Were there any witnesses?	Yes / No If yes, provide names and roles:
SECTION D: DECLARATION	
I confirm that:	The information in this form is factual and accurate to the best of my knowledge. I have not shared this concern with anyone other than the DSL. I understand that this form is strictly confidential. Signature: _____ Date: _____

FOR DSL USE ONLY	
Date and time received by DSL	<input type="checkbox"/> No further action <input type="checkbox"/> Children's Services <input type="checkbox"/> Adult Social Care <input type="checkbox"/> Police <input type="checkbox"/> LADO <input type="checkbox"/> Channel <input type="checkbox"/> Other
Assessment of risk level (1–4)	
Action taken	
Referral made to	
Date of external referral	
Outcome	
Next review date	
DSL signature	

Appendix B: Body Map Template

Where physical injuries are disclosed or observed, use this body map to record the location, nature and description of injuries. Use factual language only (e.g. 'bruising approximately 3cm x 2cm, yellowish-green in colour, on upper left arm'). Do not speculate about cause.

FRONT VIEW	REAR VIEW
<i>[Body outline diagram — mark injury locations with X and number]</i>	<i>[Body outline diagram — mark injury locations with X and number]</i>
INJURY DESCRIPTIONS	
Injury 1: Location	Injury 1: Description (colour, size, shape, fresh/old):
Injury 2: Location	Injury 2: Description (colour, size, shape, fresh/old):
Injury 3: Location	Injury 3: Description (colour, size, shape, fresh/old):
Injury 4: Location	Injury 4: Description (colour, size, shape, fresh/old):
Injury 5: Location	Injury 5: Description (colour, size, shape, fresh/old):

This body map must be attached to the Safeguarding Concern / Referral Form and passed to the DSL. Retain the original; do not photocopy or photograph injuries without the DSL's instruction.

Appendix C: Indicators of Abuse — Quick Reference

Print and keep accessible. For full guidance, see Section 11 of this policy.

Type of Concern	Key Indicators to Look For
Physical abuse	Unexplained bruising, burns, fractures; injuries in unusual locations; injuries inconsistent with explanation; flinching; fearfulness
Emotional abuse	Sudden behaviour change; extreme withdrawal or aggression; low self-esteem; excessive compliance; age-inappropriate behaviour; self-harm
Sexual abuse	Age-inappropriate sexual knowledge; sexualised behaviour; unexplained gifts or money; pregnancy in unclear circumstances; withdrawal
Neglect	Poor hygiene; undernourishment; persistent tiredness; poor attendance; untreated medical needs; inappropriate clothing for conditions
Domestic abuse	Injuries; fearfulness toward a partner/family member; controlling relationship; disclosures of violence; unexplained absences
CSE / CCE	Unexplained gifts/money; association with older people; going missing; drugs/alcohol; withdrawal from College and social life
County Lines	Multiple phones; unexplained travel; signs of control or threats; cash/unexplained income; poor engagement
FGM	Mentions a 'special procedure'; extended absence following travel; pain; fear of return home; disclosure
HBA / Forced marriage	Fear about return home; talk of travel; not returning after break; family enquiries; request for absence letter
Online harm	Distress after device use; secretive online behaviour; older 'friends' known online only; explicit content; withdrawal
Radicalisation	Expressions of extremist views; new secretive contacts; online extremist content; sudden social withdrawal; see Prevent Policy

IF IN DOUBT, REPORT. Do not investigate. Do not promise confidentiality. Contact the DSL immediately. If the student is in immediate danger, call 999 first.

Appendix D: Key Contacts Directory

Internal EDA College Contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Manager of Student Services	Via EDA College main office
Deputy DSL	Academic Registrar	Via EDA College main office
Principal	[Name TBC]	Via EDA College main office
Safeguarding Governor	[Name TBC — to be confirmed]	Via Clerk to the Board

External Emergency and Statutory Contacts

Organisation	Contact Details	When to Use
Emergency services	999	Immediate risk of harm to life
West Midlands Police (non-emergency)	101	Reporting crimes; safeguarding referrals where not immediate
Birmingham Children's Services (office hours)	0121 303 1888	Referrals for under-18s; s.17 and s.47 enquiries
Birmingham Children's Services (out of hours)	0121 675 4806	Emergency out-of-hours referrals for under-18s
Birmingham Adult Social Care	0121 303 1234 (office hours) 0121 675 4806 (out of hours)	Referrals for adults at risk; Care Act s.42 enquiries
Birmingham LADO	0121 303 1888 (ask for LADO)	All allegations against staff involving children
NSPCC Helpline	0808 800 5000 / help@nspcc.org.uk	Advice on child protection concerns; national reporting
ChildLine	0800 1111	For children and young people to call directly
Forced Marriage Unit	020 7008 0151	Advice on forced marriage and HBA
National Domestic Abuse Helpline	0808 2000 247 (24 hours)	Domestic abuse support; advice; referrals
Birmingham and Solihull Women's Aid	0808 800 0028 (24 hours)	Local domestic abuse support
Men's Advice Line	0808 801 0327	Domestic abuse support for men
Galop (LGBT+ abuse)	0800 999 5428	Support for LGBT+ people experiencing domestic or honour-based abuse
Modern Slavery Helpline	0800 012 1700 (24 hours)	Reporting modern slavery and trafficking
Samaritans	116 123 (24 hours)	Emotional support; crisis support
PAPYRUS (young people suicide prevention)	0800 068 4141	Concerns about suicide risk in young people
Anti-Terrorist Hotline	0800 789 321 (24 hours)	Non-emergency terrorism concerns; Prevent referrals

Approved by the Academic Board of EDA College | August 2025

This policy is reviewed annually or sooner if legislation or statutory guidance changes. Next review: August 2026.

Educate. Develop. Empower.