Safeguarding and Prevent Policy

whc group

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Reporting a Concern

If any member of staff has a concern of a safeguarding or child protection nature about a student, they have a responsibility to share this information and inform a member of the safeguarding team immediately.

Where staff have a concern about a child or Vulnerable Adult, they should telephone through any safeguarding concerns to a member of the Safeguarding team immediately and without delay.

In line with usual reporting procedures, a Child Protection/Vulnerable Adult concern form should be completed; the account must be clear, precise and a factual account of observations made. Where relevant, it should include screenshots of online conversations.

A downloadable copy of the concern form is available on *SharePoint*.

This form should only be emailed once the member of staff has spoken to a member of the Safeguarding team and been directed to do so.

Key Safeguarding Contacts

Name	Role	Contact details
Emma Doree	Principal - Watford Campus	07920 028361
Dominique Dennemont	Director of Inclusion	07500 126435
Caroline Smart	Group Head of Student Support	07739 792058
Bartosz Boho	Head of Youth Engagement and Diversion	07540 717020
Sabrina Barry	Head of Enrichment and Wellbeing	07702 669777
Amy Hard	Student Support Manager	07702 669768
Stephanie Tullberg	Student Support Manager	07920 028385
Gareth Styles	Head of Foundation Studies – West Herts	07920 089011
Sam Takis	Head of Hair and Beauty – West Herts	07522 235947
Nicola Cagier	Vice Principal Estates and Facilities	07549 022777
Ricardo Costa	Quality Manager	07513 128225
Kara Dunn	Head of Engineering - Barnfield	07739 361598

General Policy Statement

West Herts College Group has a statutory duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children, young and vulnerable people receiving education and training at the College. It recognises its role, along with other local services, in facilitating the well-being of children, young and vulnerable people while providing a safe environment to learn in.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and acting to enable all children to have the best outcomes.

This policy and procedures have been developed in accordance with guidance issued by the Department for Education, relevant county Safeguarding Children's Partnership and other relevant bodies. This policy applies to all staff, governors, and external organisations or individuals, including contractors, working within the college environment or on behalf of the West Herts College Group. The word "staff" is used for ease of description.

To safeguard and promote the welfare of children and vulnerable adults, West Herts College Group will act in accordance with the following legislation and statutory guidance:

Legislation	Reference	Purpose / Summary
	Education Act 2002 (s175)	Duty on schools and local authorities to safeguard and promote welfare.
	Children Act 1989	Framework for child protection and welfare.
	Children Act 2004	Strengthens inter-agency safeguarding duties.
	The Care Act 2014	Protects adults' wellbeing and care needs.
	The Children and Young Person Act 2008	Improves support and outcomes for children in care.
	Children's Wellbeing and Schools Act 2026.	Aims to improve outcomes for children through stronger safeguarding, better social care support, and improvements to the education system.
	Sexual Offences Act 2003	Legal framework for offences against children.
	Safeguarding Vulnerable Groups	Defines regulated activity

	Act 2006	and barring arrangements.
	Counter Terrorism and Security Act 2015	Helps prevent people from being drawn into terrorism.
	The Education (Pupil Information) (England) Regulations 2005	Sets rules for how schools collect, manage, and share pupil information.
	Homelessness Reduction Act (2017)	Improves support to prevent and reduce homelessness.
	Protection of Freedoms Act 2012	Reformed DBS and vetting system.
	Serious Crime Act 2015 (FGM)/ Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015) Police Act 1997	Mandatory reporting duty for known FGM cases.
	Children and Social Work Act 2017	Strengthened safeguarding partnerships.
	Data Protection Act 2018 & UK GDPR	Lawful handling and sharing of information.
	Domestic Abuse Act 2021	Recognises children as victims of domestic abuse.
	Education and Training (Welfare of Children) Act 2021	Safeguarding duties for post-16 providers.
	Online Safety Act 2023	Protection from online harms.
Statutory Guidance	**Reference**	**Purpose / Summary**
	Keeping Children Safe in Education 2026	Core safeguarding guidance for schools and colleges.
	Working Together to Safeguard Children	National multi-agency safeguarding framework.
	Prevent Duty Guidance: Further Education Institutes in England & Wales (April 2023)	Guides colleges on preventing people from being drawn into terrorism.
	The Prevent duty: safeguarding learners susceptible to radicalisation - GOV.UK	Practical guidance for designated safeguarding leads
	Child abuse concerns: guide for practitioners	Provides practical guidance to help professionals recognise, respond to, record, and report concerns about child abuse and neglect to safeguard children effectively.
	Information Sharing Advice	Guidance on information sharing.
	Children Missing Education	Guidance on CME responsibilities.

	Working Together to Improve School Attendance	Attendance as a safeguarding issue.
	After-school clubs, community activities, and tuition Safeguarding guidance for providers	Helps providers keep children safe during out-of-school activities.
	Work based students and the prevent Statutory Duty September 2018	Ensures students in workplaces are protected from the risk of radicalisation.
	DfE guidance: Meeting digital and technology standards in schools and colleges	Supports colleges in maintaining safe, secure, and effective digital systems.
	Allergy safety in schools - GOV.UK	Statutory guidance about the support that pupils with allergies must receive in schools.
	Supporting pupils with medical conditions at school - GOV.UK	Statutory guidance about the support that pupils with medical conditions should receive at school..
Local Procedures	**Reference**	**Purpose / summary**
	Hertfordshire Safeguarding Children Partnership (HSCP)	Hertfordshire safeguarding arrangements.
	HSCP Procedures Manual	Multi-agency child protection procedures.
	Resolution of Professional Differences and Escalations	Procedure for resolving safeguarding disagreements.
	Families First / Early Help	Early intervention and support.
	Safeguarding Bedfordshire - Luton Safeguarding Children Partnership	Luton safeguarding arrangements

The College Group will keep its policy and procedures on children and vulnerable adult protection under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children, young people and vulnerable adults.

West Herts College Group is committed to ensuring that it:

- Provides a safe environment for all of its students to learn in

- Everybody working in the College understands their safeguarding responsibilities and has an awareness of safeguarding issues that can put children at risk of harm. Staff recognise that safeguarding concerns can occur both online and offline.

- Identifies children and young or vulnerable people who are suffering, or likely to suffer significant harm and are protected from maltreatment. Takes appropriate action to help ensure that such children and young or vulnerable people are kept safe, both at home, at the College and online.

- Will refer concerns that a child or young or vulnerable person might be at risk of significant harm to Children's Services or an appropriate agency.

- Raises awareness of issues relating to the welfare of children and young or vulnerable people and the promotion of a safe environment for the children and young or vulnerable people learning within the College campuses

- Staff and managers understand the risks posed by adults or young people who use the internet to bully, groom or abuse children, young people and vulnerable adults and support them in learning how to keep themselves safe.

- Staff are aware of emerging online risks associated with artificial intelligence (AI), including AI-generated sexual images, deepfakes, online impersonation, grooming, exploitation, misinformation, and the misuse of AI tools to create, manipulate or share harmful content.

- Aids the identification of children and young or vulnerable people at risk of significant harm and provide procedures for reporting concerns.

- Establish procedures for reporting and dealing with allegations of abuse against members of staff. Recruits staff and volunteers safely ensuring all necessary checks are made and reviews policies and procedures annually. All Staff and Governors will receive safeguarding awareness training and updates.

- All staff working with children, young people and vulnerable adults will receive appropriate safeguarding training to ensure they understand their responsibilities, protection issues, and the College's policies and procedures. Staff will undertake annual refresher training on changes to statutory guidance and emerging local, national and online safeguarding risks and trends.

- Has a senior member of the College management team with lead responsibility for protection issues, they will be supported by a designated safeguarding team.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Prevent Duty

Protecting students from the risk of radicalisation is seen as part of College's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The college will;

- Ensure Prevent awareness training is delivered as an essential part of safeguarding training to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas.
- Ensure that students are safe from terrorist and extremist material when accessing the internet in College.
- Safeguarding team must understand when it is appropriate to make a referral to the Channel programme.
- Have policies and procedures in place for the management of events held on their premises. The policies should apply to all staff, students and visitors and clearly set out what is required for any event to proceed.
- Consider carefully external speakers and whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups.
- Lettings, Prayer facilities and other quiet spaces are subject to clear expectations & oversight.
- In partnership with the local Prevent teams, carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.

Key guidance:

- The Prevent duty
- Prevent Duty Guidance: Further Education Institutes in England & Wales
- The Prevent duty: safeguarding learners susceptible to radicalisation - GOV.UK

Designated Staff with Responsibility for Safeguarding

The ultimate responsibility for safeguarding students and staff rests with the highest level of management. However, responsibilities are delegated throughout all levels of the organisation, identifying individuals with particular responsibilities for safeguarding.

It is important that everyone is aware of the legal responsibilities and works together to maintain high standards with regards to safeguarding. Everyone must know what lines of communication and levels of responsibility exist to ensure that all Safeguarding, safety, health and environment matters are dealt with efficiently and effectively.

This policy is supported by other policies, procedures and guidelines which have been identified as necessary to protect the safety and health of employees, students and other people who may attend the College campuses, including safeguarding all who learn or work or visit all facilities. It applies to all West Herts College Group employees and Students and covers all locations where they learn or work.

The Designated Senior Lead (DSL) with responsibility for safeguarding issues relating to child protection, vulnerable adults and Prevent Duty is:

Emma Doree, Principal – Watford Campus – Designated Safeguarding Lead at the West Herts College Group.

The Designated Senior Leader role is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- Providing advice and support to other staff on issues relating to child and young or vulnerable people's protection
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- Taking a lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Ensuring the college adheres to the Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015). Statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Statutory guidance: Multi-agency statutory guidance on female genital mutilation
- Ensuring that parents of children and young or vulnerable people within the College are aware of the College's protection policy
- Ensuring the Principal and Chief Executive and Marketing Directorate are briefed of any relevant Safeguarding incident or issues that arise.
- Liaising with local authorities, Children's and adult services, Hertfordshire Safeguarding Children's Partnership (HSCP), Luton Safeguarding Children's Partnership (LSCP) and other appropriate agencies
- Liaising with local schools DSL's if a Safeguarding concern is raised in relation to a student (14-16).
- Liaising with external safeguarding and specialist agencies over suspected cases of abuse and contributing to the inter-agency strategy discussions.

- Providing guidance to parents, students and staff about how to obtain suitable support relating to safeguarding issues and how to access the policy.

- Liaising with secondary schools which send students to the College to ensure that appropriate arrangements in place for students before they start.

- Liaising with employers and training organisations that receive children or young or vulnerable people from the College on long term placements to ensure that appropriate safeguards are put in place.

- Ensuring that staff receive basic training in protection issues and are aware of the College protection procedures. An annual report will be taken to the governing body of the College setting out how the College has discharged its duties. The DSL is responsible for reporting deficiencies in procedure or policy identified by the HSCP (or other external agencies) to the governing body at the earliest opportunity.

Designated Staff Members

These staff are senior members of the College management team and have a key duty to take lead responsibility for raising awareness of issues relating to the welfare of children and young or vulnerable people, and the promotion of a safe environment for students within the College campuses.

The DSLs have all received training in child protection, safeguarding and inter-agency working, as required by the Hertfordshire Safeguarding Children Partnership (HSCP), Luton Safeguarding Children Partnership and Children's Services. They will undertake safeguarding training at least every two years and, in addition, will update their knowledge and skills at regular intervals through safeguarding briefings, updates, networking, reading and engagement with local and national safeguarding developments to ensure they remain fully up to date with emerging issues and statutory requirements.

If the DSL is unavailable, there are other designated Deputy Leads with responsibility for safeguarding issues and the wider safeguarding team will provide support as necessary.

Name	Role	Contact details
Emma Doree	Principal – Watford	07920 028361
Dominique Dennemont	Director of Inclusion	07500 126435
Caroline Smart	Group Head of Student Support	07739 792058
Bartosz Boho	Head of Youth Engagement and Diversion	07540 717020
Sabrina Barry	Head of Student Experience	07702 669777
Amy Hard	Student Support Manager	07702 669768
Stephanie Tullberg	Student Support Manager	07920 028385
Gareth Styles	Head of Foundation Studies – West Herts	07920 089011
Sam Takis	Head of Hair and Beauty – West Herts	07522 235947
Nicola Cagier	Vice Principal Estates and Facilities	07549 022777
Ricardo Costa	Quality Manager	07513 128225
Kara Dunn	Head of Engineering - Barnfield	07739 361598
Rachel Fox	Designated Safeguarding, SEND and Inclusion Governor.	-

The Safeguarding team staff members:

- Report to the senior member of staff with lead responsibility.
- Will know how to make an appropriate referral after discussion with DSL or CLG member of safeguarding team prior to referral.
- Will be available to provide advice and support to other staff on issues relating to safeguarding.
- Have particular responsibility to be available to listen to children and young or vulnerable people studying at the College.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection issues, Prevent duty and inter-agency working, as required by the HSCP, and will receive relevant refresher training at least every 2 years.

The Governing Body

The Governing Body is responsible for ensuring there are sufficient measures in place to safeguard children and vulnerable adults within the College. A Designated Safeguarding Governor is responsible for liaising with the Principal and Senior Staff Members with Lead Responsibility over matters regarding protection, including:

- Governing body must ensure that they comply with their duties under legislation. Ensuring that the College has procedures and policies which are consistent with the National and local Safeguarding Board guidance and that they comply with all their duties under current legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in the college are effective and comply with the law at all times.

- Governing bodies should ensure that the college contributes to inter-agency working in line with statutory guidance Working together to safeguard children 2026 Ensuring that the Governing Body considers the College policy on protection each year.

- Governing bodies should ensure that filtering and monitoring systems are effective, reviewed at least annually, and that appropriate oversight is in place through senior leadership, the DSL and IT services.

- Ensuring that each year the Governing Body is informed of how the College audits staff have complied with the policy, and the training that the staff have undertaken.

- To assist in these duties, the Designated Governor shall receive appropriate training.

- To monitor the college's performance against this policy and relevant legislation the Designated Governor will meet termly with the Senior Staff Member with Lead Responsibility, and the meetings will be recorded. In line with the procedures set out for staff suspension and disciplinary matters, the Chair, the Principal, staff and student governors are not eligible to be nominated as Designated Governors.

- Governing bodies should consider how students may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through the Personal Development programme.

Procedures for dealing with disclosure of abuse and reporting concerns

Safeguarding is everyone's responsibility. All staff are required to read and understand Part One of *Keeping Children Safe in Education (KCSIE)* and confirm this annually as part of the College's safeguarding arrangements.

Staff must also attend and engage with:

- mandatory induction safeguarding and child protection training (including online safety)
- annual safeguarding updates (arranged online and in team meetings).

If any member of staff has a concern of a safeguarding or child protection nature about a student, they have a responsibility to share this information and inform a member of the safeguarding team immediately.

Staff should maintain an attitude of professional curiosity and respectfully explore signs, indicators or patterns of behaviour that may suggest a child, young person or vulnerable adult is at risk of abuse, neglect, exploitation or other safeguarding concerns. Where concerns remain, staff should not assume that someone else has taken action and must follow the College's safeguarding reporting procedures.

Information should be reported on a Child Protection/Vulnerable Adult concern form/referral process. The account must be clear, precise and a factual account of observations made.

Records should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.

The safeguarding team and DSL will then decide whether the concerns require referral to any external services/ agencies.

Depending on the nature of the concern and other relevant factors, such as any potential breach of bail conditions, risks to students or staff, the seriousness of the incident, and the suitability of the student's course, a student may be restricted from attending college or participating in college activities, trips, or visits. Any such decision will be reviewed following further investigation and/or information received from relevant external agencies, including the police, Youth Offending Team, probation services, and legal representatives.

Where there is a delay, or a student is unable to access College arrangements will be made for them to receive work and have contact with their tutors.

Information Sharing, Confidentiality and Consent

The College recognises that effective information sharing is essential to safeguarding and promoting the welfare of children, young people and vulnerable adults. Information will be shared appropriately, lawfully and in a timely manner with relevant professionals and agencies where necessary to safeguard and protect individuals from harm, in accordance with statutory guidance, data protection legislation and local safeguarding procedures.

Staff should use professional judgement to ensure that any information shared is relevant, necessary and proportionate. Information should only be shared with those who need to know. Data protection legislation and concerns about confidentiality must not prevent the sharing of information where this is necessary to safeguard a child, young person or vulnerable adult.

The College aims to work openly and transparently with students, parents and carers wherever it is appropriate and safe to do so. Where information needs to be shared for safeguarding purposes, consent is not normally required where there is an appropriate lawful basis for sharing the information. The UK GDPR and Data Protection Act 2018 provide a framework that enables information to be shared lawfully for safeguarding purposes.

Where it is appropriate and safe, the College will inform students and/or parents or carers about what information is being shared, with whom and why. Information may be shared without consent, or without informing the individual concerned, where:

- seeking consent or informing the individual may place a child, young person, vulnerable adult or another person at increased risk of harm;
- doing so may cause an unacceptable delay in safeguarding action;
- it may prejudice the prevention, detection or investigation of a crime;
- it may compromise the actions of Children's Services, Adult Social Care, the Police or another safeguarding agency; or
- there is another lawful basis or statutory duty to share the information.

Where information is shared, staff should record the decision and the reasons for it, including the lawful basis for sharing where appropriate. Where a decision is made not to share information in relation to a safeguarding concern, the reasons for that decision should also be recorded.

All safeguarding records, information-sharing decisions and referrals will be recorded accurately and factually and stored securely in accordance with the College's safeguarding and data protection procedures.

Dealing with a disclosure

If a child or young person tells a member of staff about possible abuse the following guidance should be followed:

- Listen carefully and calmly to what is being shared, without showing shock or disbelief. Do not question or interview the child or young person. Allow them to speak freely, asking only essential clarification questions when needed to ensure you have understood what they are telling you.

- Allow the child or individual to speak freely and in their own words. Avoid leading questions or suggesting answers, and do not put words into their mouth. Reassure them that they have done the right thing by sharing their concerns. Make it clear that, while you will treat the information sensitively, you cannot promise confidentiality, as it may need to be shared with appropriate safeguarding professionals to help keep them safe and supported.

- Provide reassurance that the victim has been heard, taken seriously, and that appropriate action will be taken. Ensure they know they will be supported and kept safe wherever possible. Staff must not minimise concerns or suggest that the victim is responsible for the abuse, sexual violence, or sexual harassment they have experienced. Care should be taken to avoid any language or behaviour that could make the victim feel blamed, judged, or ashamed for reporting their concerns.

- Report the concern immediately to a member of the Safeguarding Team in person or by telephone.

- Complete the Child Protection and Vulnerable Adult Concern Form on SharePoint, recording all relevant details accurately and using the student's own words wherever possible.

- After discussing the concern with a member of the Safeguarding Team, complete the Child Protection and Vulnerable Adult Concern Form and email it directly to the member of staff you have spoken to.

- Make a detailed and accurate record of the concern, including the date, time and place, as well as the child or person's own words wherever possible. Record a full account of the conversation and any other observations or concerns that may be relevant. Staff must not investigate concerns or allegations themselves. All concerns should be reported immediately to the Designated Safeguarding Lead or a member of the Safeguarding Team

- When a concern is made regarding a student on a Sub-Contractors programme, the safeguarding responsibility remains with the college and a member of the Safeguarding team will liaise with the relevant sub-contractors.

Safeguarding, Legal Proceedings and Police involvement

The College is committed to safeguarding and promoting the welfare of all students and staff. Where a student is subject to legal proceedings or where significant safeguarding concerns have been identified, the College will work collaboratively with relevant external agencies to assess and manage any associated risks.

Where there are concerns that a student's continued presence on campus may pose a risk to the safety and wellbeing of others, or where the College is unable to reasonably

manage the circumstances, the College reserves the right to temporarily restrict access to campus, activities, trips and visits, or, in exceptional cases, to permanently withdraw a student from the College. Any such decision will be made in accordance with safeguarding procedures, College policies, and in consultation with relevant agencies and authorities where appropriate.

Where it is assessed that the student can continue to access education safely, the College will implement a Risk Management Plan. This will include agreed conditions and regular meetings with the student's Head of School to monitor progress and ensure continued suitability.

Support for Staff

If you wish to discuss concerns or issues that might arise from having a student disclose a safeguarding concern to you support and advice is available to you from the Safeguarding team and Human Resources.

Abuse and Related Issues of Safeguarding

The definitions and types of abuse neglect and exploitation detailed are taken from Keeping Children Safe in Education Statutory guidance for schools and colleges (September 2026

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. 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.

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

Emotional abuse:

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 :

Involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

Children can be sexually abused within the family, an institution or a community setting and often know the person carrying out the abuse.

The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) 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.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the college's policy and procedures for dealing with it.

There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect :

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. Neglect may occur during pregnancy, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic

emotional needs.

There are a number of other specific safeguarding issues and types of abuse, some of which are listed below. If staff need support or are in any doubt, they should seek guidance from the DSL.

Mental Health

All staff should be aware 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.

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, and

• 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.

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.

Children who are questioning their gender

Children who are questioning their gender may need sensitive and thoughtful support. The College will take time to understand the thoughts and feelings of the child and remain aware of any potential vulnerabilities, including mental health and psychosocial needs, family and peer relationships and discriminatory bullying.

The College will consider the individual circumstances of the child, what is in their best interests, its safeguarding duties and its obligations under the Equality Act and Human Rights Act. Parents and carers will be involved in decision-making wherever possible.

Any arrangements relating to single-sex facilities will be made in accordance with KCSIE and relevant statutory requirements. Suitable alternatives will be considered for children who do not wish to use facilities designated for their biological sex, without compromising the provision of single-sex facilities.

Where a course or curriculum activity requires specific practical participation, teaching arrangements, or assessment requirements, such as in beauty therapy or sports massage, reasonable alternative arrangements will be considered to support participation. Any adjustments will be made in a way that maintains the integrity of the curriculum, meets assessment requirements, and respects the rights and dignity of all students.

Safeguarding Children with medical conditions

An incident relating to the management of a learner's medical condition, including allergies, does not in itself require a safeguarding referral. A referral will only be considered where concerns arise that a learner may be at increased risk of neglect, abuse, or exploitation by individuals within or outside their family due to their medical condition. This may include circumstances where relevant information about a learner's medical needs is not shared with the College, or where a learner is repeatedly without essential medication, placing them at risk of harm. In such cases, safeguarding procedures will be followed in line with statutory guidance and the College's safeguarding arrangements.

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 designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual student and others in the college, considering wider information or concerns, and take appropriate action.

College plays 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.

Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information and training for professionals on exploitation and modern slavery is available here - Modern slavery training: resource page - GOV.UK

The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance Modern slavery: how to identify and support victims - GOV.UK

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

It is the College's responsibility to protect and educate students in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.

The College utilises web filtering and monitoring systems to support online safety, which is informed in part, by the Prevent Duty risk assessment. Appropriate filtering and monitoring systems in place and are reviewed to ensure their effectiveness.

Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views; being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

- **contact:** being subjected to harmful online interaction with other users; 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 (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images 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/).

When a concern is raised by a member of staff or through IT systems (such as via. web filtering and monitoring) the Safeguarding team work with Technical services to establish details and a record of anything that has been searched. Appropriate action is then taken either informing parents or external services including the Police and/or National crime agency and students could be managed through managing student behaviour process where required.

Child criminal exploitation (CCE) and child sexual exploitation (CSE):

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified**.**

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing.

They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm

from others.

Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims.

It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Key to identifying potential involvement in CCE are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. 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.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include:

- abuse and neglect, which may include:
- sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.

It may indicate also:

- mental health problems,
- risk of substance abuse,
- risk of travelling to conflict zones, • risk of female genital mutilation or
- risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Safeguarding adults:

Safeguarding adults is also integral to complying with legislation, regulations. This applies to anyone over 18 who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect him or herself against significant harm or exploitation.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to,

psychological, physical, sexual, financial or emotional.

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 (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, and ability to learn.

Experiencing domestic abuse and/or violence, can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. Operation Encompass report over 2,000 notifications are made to settings every day.

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents

Financial or material abuse

Including theft, fraud, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Female Genital mutilation (FGM) is a criminal offence – it is child abuse and a form of violence against women and girls. Female genital mutilation comprises all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non- medical reasons. There are many health risks associated with FGM both immediate and longer term, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Under current Keeping Children Safe in Education statutory guidance, staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Unless the teacher has good reason not to, they should still consider and discuss any such case with the college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance 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) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The safeguarding team are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their

accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

Most College staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: here.

So Called 'Honour' based Abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/ community members.

Child on child abuse (including harassment and violence)

The college recognises that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online.

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children 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 behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

The College recognises that child-on-child abuse is a safeguarding concern for both the person experiencing harm and the alleged perpetrator and will provide appropriate support and intervention.

Sexual violence and Abuse

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support and that they are given as much control as reasonably possible to any decisions regarding how any investigations progress. The College have a duty to report any instances of sexual violence or assault on an under 18 to the police and or Next of Kin where appropriate. All student will be supported to access support and help from external agencies. All instances of Sexual violence, assault or Harassment are reported to the DSL.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- Important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- Harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A

does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The Colleges and all staff can access broad government guidance on the issues listed via the www.gov.uk website, Keeping Children safe in Education guidance.

Receiving an Allegation / Concern about a member of staff including agency staff, volunteers and contractors or an organisation using College premises

West Herts College Group is committed to creating a strong safeguarding culture in which all concerns about the conduct of adults working with children, young people and vulnerable adults are recognised, reported and managed appropriately.

Maintaining an open, transparent and respectful culture helps to identify concerning behaviour at an early stage, protects students, and supports staff to maintain the highest standards of professional conduct.

The two levels of allegation/concern:

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'

A safeguarding allegation is any information which indicates that a member of staff may have:

- Behaved in a way that has or may have harmed a child or vulnerable adult
- Possibly committed a criminal offence against/related to a child/ vulnerable adult
- Behaved towards a child or children in a way which indicates they would pose a risk of harm if they work regularly or closely with children and vulnerable adults.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any member of staff who receives an allegation of a safeguarding nature about another member of staff should follow the procedures for dealing with a concern and then report the concern immediately to the Designated Senior Leader for safeguarding or in their absence the Deputy Principal.

A low level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school or college may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

• does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

• being overfriendly with children,

• having favourites,

• taking photographs of children on their mobile phone, contrary to school policy,

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating children.

Responsibilities of Human Resources and Designated Senior Leader with regards to Allegations of Abuse against Members of Staff.

The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind, and that investigations are thorough and dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The College has a duty of care to their employees and will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

In the event an allegation of a safeguarding nature is made against a member of staff it must be reported immediately to the Designated Senior Leader for Safeguarding who will seek the advice of the Director of Human Resources.

Any necessary disciplinary action or investigation will be conducted in accordance with the existing staff disciplinary procedures.

The Designated Senior Leader and Director of Human Resources will notify the Chief Executive unless the Chief Executive is the person against whom the allegation is made. In which case the report, should be made to the Senior staff member with Lead

Responsibility for safeguarding who will take appropriate advice and inform the Chair of Corporation where/when necessary.

Initial Assessment to be carried out by the Designated Senior Leader

The Designated Senior Leader should make an initial assessment of the allegation, consulting with the Director of Human Resources. Where the allegation is considered to be either a potential criminal act or indicates that the child or person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported within 24 hours to the HSCP, Local Authority Designated Officer (LADO) or other appropriate supporting agencies where appropriate.

Obtain written details of the allegation from the person who received it, ensuring they are signed and dated. Record information about times, dates, locations and names of potential witnesses.

It is important that the Designated Senior Leader does not investigate the allegation. The initial assessment should be on the basis of the information received and is to be used to support the decision whether or not the allegation warrants further investigation.

Enquiries and Investigations with regards to staff

Child or young or vulnerable adult protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College should assist the agencies with their enquiries.

The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform with the existing staff disciplinary procedures.

Where an allegation of a safeguarding nature has been made against a member of staff, the Director of Human Resources and Designated Senior Leader will oversee the investigation jointly and at the conclusion of the investigation or any disciplinary action, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures/ policies and if there are any matters arising which should be drawn to the attention of the HSCP.

If there is an investigation by an external agency, for example the police, the Designated Senior Leader should normally be involved in, and contribute to, the inter-agency strategy discussions.

The Designated Senior Leader is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate

confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. Designated person or Deputy Principal shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to any conditions set by the police or other investigating agency, the designated person will:

- Inform the child/person or parent/carer alleging that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of a child/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Where appropriate inform the Chair of Governors and/or a designated governor of the outcome of the investigation.
- Keep a written record of the action taken in connection with the allegation. Follow latest advice/ Guidance from the Department of Education regarding managing allegations of abuse against teachers and other staff.

If the College receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow their safeguarding policies and procedures, including informing the LADO.

Whistleblowing

The College encourages a culture of openness and accountability. Any concerns regarding safeguarding practice, the conduct of staff, or the welfare of learners should be reported in line with the College's Whistleblowing Policy and safeguarding procedures.

Monitoring Effectiveness

Where a child protection/ safeguarding allegation has been made against a member of staff, the Deputy Principal/ Principal together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to

the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the HSCP. Consideration should also be given to the training needs of staff.

Related Policies and Procedures

- Safeguarding Managing incidents and emergency service procedures.
- Criminal Convictions Procedure Recruitment and Safer Recruitment Policy Staff Code of Conduct
- Staff Disciplinary Policy and Procedure
- Managing Student Behaviour Policy and Procedure

Safeguarding Policy Review

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2007 Amended March 2009

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Corporation, March 2011 Reviewed and approved

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