

Safeguarding Policy and Procedures

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1. 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 taking action 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 and Hertfordshire Safeguarding Children's Board (HSCB) 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.

In order 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:

- The Children Act 1989
- The Children Act 2004
- Education Act 2002 (section 175)
- The Children and Young Person Act 2008
- The Safeguarding Vulnerable Groups Act 2006
- The Care Act 2014
- Keeping Children Safe in Education - Statutory Guidance for Schools and Colleges (Sept 2018)
- Prevent Duty Guidance for Further Education Institutes in England and Wales (July 2015) Counter Terrorism and Security Act 2015 • Serious Crime Act 2015
- Work based learners and the prevent Statutory Duty September 2018
- Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures
- The Procedures of Luton Safeguarding Children Board
- Working Together to Safeguard Children (July 2018)
- The Education (Pupil Information) (England) Regulations 2005
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
- The Counter-Terrorism and Security Act (2015)
- Homelessness Reduction Act (2017)
- Sexual Offences Act (2003)

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
- 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 Social 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.
- 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.
- Training all staff working with children and young or vulnerable people adequately to familiarise them with protection issues and responsibilities and the College procedures and policies, attending appropriate refresher training at least every 3 years.
- Has a senior member of the College management team with lead responsibility for protection issues. He/she will be supported by a designated safeguarding team.

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.

- 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.
- In partnership with local Prevent team carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.

Hyperlink

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445915/Prevent_Duty_Guidance_For_Further_Education_England_Wales_-_Interactive.pdf

2. 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 Leads (DSL) with responsibility for safeguarding issues relating to child protection, vulnerable adults and Prevent Duty are:

Emma Doree, Director of Student Experience – Watford Campus, Hemel Hempstead and Kings Langley campuses

Beth Taylor, Director of Student Support – New Bedford Road and Enterprise Way campuses

Alison Caudwell, Nursery Manager- Barnfield Nursery

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 DSL's have all received training in child and young or vulnerable learner protection issues and inter-agency working, as required by the Hertfordshire Safeguarding Children Board HSCB, Luton Safeguarding Children Board and children's services will receive appropriate refresher training and or updates every 2 years. The DSL's should keep up to date with developments in all relevant protection issues.

The designated senior person 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)
- 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. Hyperlink (www.gov.uk/government/publications/female-genital-mutilation-guidelines)
- 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 Childrens Board (HSCB), 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 HSCB (or other external agencies) to the governing body at the earliest opportunity.

Designated Staff Members

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.

Campus	Deputy Leads	Safeguarding Team
Watford Hemel Hempstead Kings Langley	Sarah Knowles Caroline Hunt	Susan Lomas Shareen Hanson Gareth Styles Sam Takis Dominique Dennemont
Enterprise way New Bedford Road		Amber Turner Bartosz Boho Demi Hopper Safina Khatoun Sabrina Barry
Barnfield Nursery	Chloe Mitchel	

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 HSCB, 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 2018. Ensuring that the Governing Body considers the College policy on protection each year
- Ensuring that each year the Governing Body is informed of how the College and its 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 modern Britain programme (MB).

3. Procedures for dealing with a Disclosure of Abuse and Reporting Concerns:

(Responsibility of All West Herts College Group staff)

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.

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

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

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 to what is being said without displaying shock. Do not interview the child or person concerned; listen only asking questions when necessary to clarify in order to be sure that you understand what they are telling you.
- Allow the person to speak freely ensuring you do not put words into the child or person's mouth.
- Reassure them that by telling you, they have done the right thing. Do not promise to keep what they tell you confidential.
- Explain to them that you may have to pass the information on to a member of the safeguarding team, but that only those that need to know about it will be told.

- Complete the Child Protection and Vulnerable Adult concern form found on Ishare. Add as much detail as possible using the students' own words.
- Make a detailed note of the date, time, place, what the child or person said, give a full account of your conversation, including anything else that concerns you. Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Senior Lead or, a member of the Safeguarding team.
- The Child Protection and Vulnerable Adult concern form must be handed to one of the safeguarding team in person, it must not be emailed or put in the post.
- When appropriate the Safeguarding team will undertake any required discussions and communication with parents and carers
- When a concern is made regarding a Head Start student a member of the Safeguarding team will liaise with the relevant school DSL.

Support

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.

Recognising abuse and neglect

The definitions and types of abuse and neglect detailed are taken from Keeping Children Safe in Education Statutory guidance for schools and colleges (September 2018):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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 or vulnerable adult such as to cause severe and adverse effects on their 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 not giving them 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 them. These may include interactions that are beyond their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing them 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 or vulnerable adult, although it may occur alone.

Sexual abuse: involves forcing or enticing a child, young person or vulnerable adult 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 (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or a vulnerable adult to behave in sexually inappropriate ways, or grooming a child, young person or vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance

abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child or vulnerable adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); 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.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

Child Criminal Exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines 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.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to 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.

Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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 Keeping Children Safe in Education (2016) staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Forced marriage is a criminal offense 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 communities use religion and culture as a way to coerce a person into marriage.

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 in to 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](#).

'Honour' based violence (HBV) 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 of so called HBV 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.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can

take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment

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.

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;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- 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.

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 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

4. Receiving an Allegation about a member of staff

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 she/he would pose a risk of harm if they work regularly or closely with children and vulnerable adults.

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 Person for safeguarding or in their absence the Deputy Principal / Barnfield Principal.

5. Responsibilities of Human Resources and Designated Senior Person 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 Person for Safeguarding who will seek the advice of

the Deputy Principal/ Barnfield Principal.

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

The Designated Senior Person and Deputy Principal will notify the Principal, unless the Principal 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 Person

The Designated Senior Person should make an initial assessment of the allegation, consulting with the Deputy Principal/ Barnfield Principal and 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 HSCB, 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. The written details should be countersigned and dated by the Principal (or designated person). Record information about times, dates, locations and names of potential witnesses.

It is important that the designated senior person 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.

6. 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 Deputy Principal, Human Resources' **and** Designated Senior Person 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 HSCB.

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

7. 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 HSCB. Consideration should also be given to the training needs of staff.

8 Related policies and procedures

Safeguarding
Criminal Convictions Procedure Recruitment and
Safer Recruitment Policy
Staff Code of Conduct
Staff Disciplinary Policy and Procedure
Managing Student Behavior Policy and Procedure

9. The Safeguarding Team

Name	Role	Contact Details
Emma Doree Designated Safeguarding Lead	Director of Student Experience	01923 812660 07920028361
Sarah Knowles Deputy Safeguarding Lead	Deputy Principal	01923 812320 07887624964
Caroline Hunt Deputy Safeguarding Lead	Director of HR and MIS	01923 812433 07920028386
Beth Taylor Designated Safeguarding Lead	Director Student Services	07825 995642
Alison Caudwell Designated Safeguarding Lead	Nursery Manager	01582 569614
Matt Luheshi	Member of Corporation	matt.luheshi@outlook.com
Susan Lomas	Head of Student Support and ALS	07500 126468
Shareen Hanson	Student Support Co-ordinator	07739 792058

Dominique Dennemont	ALS Co-ordinator	01923 812510
Gareth Styles	Head of Foundation Studies	07920 089011
Mahul Trivedi	Foundation Studies Co-ordinator	01923 812521
Sam Takis	Head of Curriculum - Hemel	07522 235947

10. Safeguarding Policy Review

The Safeguarding Policy was reviewed and approved by the Corporation at their meeting of 6th June 2007
Amended 20th March 2009
Reviewed by Corporation 6th May 2009
Reviewed and approved by Corporation, 20th January 2010
Reviewed and approved by Corporation, 2nd March 2011
Reviewed and approved by Corporation, 4th July 2012
Reviewed and approved by Corporation, 6th November 2013
Reviewed and approved by Corporation, 8th October 2014
Reviewed and approved by Corporation, 14th October 2015
Reviewed and approved by Corporation, 12th October 2016
Reviewed and approved by Corporation, 8th November 2017
Reviewed and approved by Corporation, 13th June 2018
Reviewed and approved by Corporation, 24th April 2019

