

## Human Resources Policy

### Safeguarding Children & Vulnerable Adults and Prevent Policy

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<i>Author</i>	<i>Vice Principal of Curriculum and Quality</i>
<i>Designated Owner</i>	<i>Vice Principal of Curriculum and Quality</i>
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## Safeguarding Children & Vulnerable Adults

### 1. Introduction

Hertford Regional College is committed to safeguarding all students, apprentices, staff, and visitors, and there are policies and procedures in place to achieve this. This policy sets out how we will actively promote the safeguarding of children and vulnerable adults including protection against extremist ideology and radicalisation.

A **child** is defined in the *Children Acts* 1989 and 2004 as anyone who has not yet reached their 18th birthday; however, the College recognises the risks posed to all students.

A '**vulnerable adult**' may be regarded as anyone of the age of 18 or older who may be unable to protect themselves from abuse, harm or exploitation, which may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment. Being vulnerable may not be a fixed status events in a person's life may lead them to be vulnerable at any point.

Within Keeping Children Safe in Education 2025 it states "Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

#### **1.1 The aims of the policy are to:**

- Establish and maintain an environment where students feel safe, are encouraged to talk, and are listened to when they have a worry or concern.
- Ensure students know who they can approach if they are worried.
- Provide protection for the children or vulnerable adults at Hertford Regional College.
- Provide staff and volunteers with training and guidance on the procedures they should adopt in the event that they suspect a student may be experiencing or be at risk of harm.

In order to protect children and vulnerable adults from harm, abuse or neglect the College will act in accordance with the following legislation and guidance:

- The Children Act 1989 & 2004
- Children and Families Act, 2014
- Education Act 2002 (Section 175/157)
- Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- Keeping Children Safe in Education- KCSiE (DfE, Sept 2025)
- Working Together to Safeguard Children (DfE 2016)
- Sexual Offences Act (2003)
- The Counter Terrorism and Security Act 2015
- Prevent Duty Guidance 2015
- HM Government Channel Duty Guidance: "*Protecting vulnerable people from being drawn into terrorism*"2015.
- CONTEST The United Kingdom's Strategy for Countering Terrorism June 2018
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE 2017)

- Special Education Needs of Disability (SEND) Code of Practice 0 to 25 years Statutory Guidance (2014)
- Care Act for Adult 2014 (adults)
- 16-19 Funding Guidance Informing ESFE about serious safeguarding incidents (DfE 2017)

Working Together to Safeguard Children (DfE 2023) requires the College to follow the procedures for protecting children from abuse which are established by the Hertfordshire Safeguarding Children Partnership.

Within the college community there are groups of students who, for one reason or another, may be vulnerable. Students in care, leaving care or those caring for relatives are amongst this group although this is not exclusive and there are other minority groups who are also considered to be more vulnerable, such as LGBTQ+ students or students with complex learning needs or disabilities.

The College supports all groups of vulnerable students and the lead for Children Looked After (CLA) in the College is the Student Services Manager.

HRC also work with the Family First team at Hertfordshire County Council, who offer information on a wide variety of services and activities for children, young people and families.

### **1.1 a Trauma Informed Practice**

Trauma-informed practice develops from the understanding of how trauma exposure can affect our neurological, biological, psychological and social development. Trauma-informed approaches are founded on the understanding and acceptance that symptoms and experiences related to trauma are coping strategies established by people to manage traumatic experiences. Trauma-informed practice seeks to avoid re-traumatisation by using the principles of safety, trustworthiness, choice, collaboration, empowerment and cultural consideration. There is a natural crossover with this approach from the principles of adult safeguarding, which are empowerment, prevention, proportionality, protection, partnership and accountability.

Some of our students will have experienced trauma and to support these students staff have undergone training to understand better the effects of trauma. In the event of traumatic incidents happening in the year the Safeguarding team and wider student services team will help students to reflect and give further support if this is required.

### **1.2 Safer Recruitment**

Safer recruitment is fully covered within HRC's Resourcing Procedure and within DBS and List 99 staff Procedure. Allegations against staff are dealt with via the Discipline Procedure which can be found on Staffnet.

### **1.3 Subcontracting**

Safeguarding compliance is a mandatory part of the annual due diligence subcontracting procedure used by HRC.

- Subcontracted services are stringently monitored to ensure sufficient and suitable DBS checking, Prevent and Safeguarding trained staff are in place within subcontracted organisations.

- Subcontractors are issued with a safeguarding reporting process (flow chart) to assist them in handling and escalating any safeguarding issues. HRC also provides subcontractors with a dedicated single point of contact.
- Audits are undertaken to ensure that subcontractors are fully compliant with health and safety, equality and diversity, employment, safeguarding and data protection legislation.
- The HRC subcontractor Due Diligence procedure and safeguarding reporting process can be found on the HRC subcontracting team site.
- Termly meetings are held with DSL's from subcontractors and the Head of Student Services and the Partnerships and Projects Manager to share good practice and report any issues.
- Termly and annual reports to governors contain a section on subcontractors.

## **2. Keeping Children Safe in Education – (KCSiE) Statutory Guidance for schools and colleges – Information for all school and college staff**

The Department for Education revised the guidance KCSiE which will come into force for schools and colleges from 1st September 2025. The guidance not been significantly changed this year most changes are technical. Below are the most significant changes:

- Specific inclusion of misinformation, disinformation and conspiracy theories as safeguarding harms (para 128)
- Reference to AI and links to guidance on safe use (para 143)
- Reference to the extended role of the Virtual Head in supporting educational achievement in kinship care (para 199)
- Reference is made to new guidance that is expected to be published this summer in relation to gender questioning children.

### **2.1 Link to Keeping Children Safe in Education (2024):**

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

### **2.2 A child centred and coordinated approach to safeguarding:**

Schools and colleges and their staff form part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

## **3. Equality and Diversity Statement**

HRC is committed to the promotion and development of equality and diversity. This policy and procedure is designed to ensure consistent, effective and fair treatment for all and has been impact assessed to ensure that it does not adversely affect users on the grounds of age, disability, race, gender, sexual orientation, gender reassignment, religion and belief or pregnancy and maternity.

This policy and procedure will be implemented in accordance with our Single Equality Scheme and any safeguarding issue will not be influenced by the student's background or situation.

#### **4. General Data Protection Regulations (GDPR) Statement**

When dealing with Safeguarding and Prevent referrals and concerns, the College processes personal and sensitive data collected in accordance with its data protection policy. Among other obligations the College is aware under both the Data Protection Act 2018 and UK General Data Protection Regulation, duties are placed on organisations to process personal information fairly and lawfully and to keep information safe and secure. Data collected by the College as part of the operation of the safeguarding process is held securely and accessed by, and disclosed to, individuals only for the purposes of managing safeguarding and Prevent concerns. Inappropriate access or disclosure of personal and sensitive data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately.

The College will follow the seven Golden rules for information sharing as outlined in the document [Information Sharing: advice for practitioners providing safeguarding services \(2024\)](#) from the DfE. These rules are:

- All Children have a right to be protected from abuse and neglect.
- Where safe to do so, inform child and carers, but you don't have to if there is risk.
- A Lawful basis to share is needed, not consent.
- Seek advice promptly wherever you are not certain.
- When sharing information steps should be taken to protect the identity of individuals at risk.
- Sharing rarely involves the whole case file.
- The reason for information sharing or not sharing should be recorded.

#### **5. Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead with lead responsibility for safeguarding and child protection at HRC is the Vice Principal Curriculum & Quality. The senior designated lead also has the responsibility to inform ESFA of serious safeguarding incidents under the guidelines stated in the table in section 12.

##### **5.1 Deputy DSL**

The College currently has three deputy DSLs for Safeguarding who carry out the same level of responsibility as DSL:

- Head of Student Services
- Student Services Manager
- ALS Manager

The Deputy DSL role is to -

- Ensure that the College operates within the legislative framework and recommended guidance
- Ensure that appropriate promotion, training and support is provided to all staff
- Develop effective working relationships with other agencies and services
- Decide whether to take further action about specific concerns (e.g. refer to Local Authority Children's Services, Safeguarding and Specialist Services), Police (cases where a crime may have been committed) and to the Channel programme (where

there is a radicalisation concern)

- Liaise with the Principal to inform them of issues - especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- Ensure that accurate records relating to individual students are kept separate from the academic files in a secure place and marked 'Strictly Confidential' in the vast majority of cases these are kept on our secure safeguarding system CPOMS.
- Submit reports to, and ensure the College attendance at, child protection conferences if appropriate
- Ensure that the College effectively monitors students about whom there are concerns
- Provide guidance to parents, students and staff about obtaining suitable support
- Produce an annual report to the Board of the Corporation and annual returns to HCC if requested
- Ensure information is shared with appropriate staff in relation to a child looked after (CLA) legal status and contact arrangements with birth parents or those with parental responsibility The Student Services Manager will ensure that details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child are held

## 5.2 Safeguarding officers

The Welfare Advisors follow up safeguarding cases and where appropriate seek guidance from a DSL or refer cases to DSL. They also receive DSL training.

## 5.3 Contact Details for Safeguarding team

The safeguarding team has a generic email [safeguardingteam@hrc.ac.uk](mailto:safeguardingteam@hrc.ac.uk) also staff can ring reception and ask to speak to a member of the team. In general referrals by staff should be made via CPOMS unless there is an imminent risk that needs to be addressed urgently.

DSL: Angela McLean	<a href="mailto:amclean@hrc.ac.uk">amclean@hrc.ac.uk</a>	01992 411449
Deputy DSL: Philip Line	<a href="mailto:pline@hrc.ac.uk">pline@hrc.ac.uk</a>	01992 411379
Deputy DSL: Helen Richards	<a href="mailto:hrichards@hrc.ac.uk">hrichards@hrc.ac.uk</a>	01992 411760
Deputy DSL: Gemma Hilton	<a href="mailto:ghilton@hrc.ac.uk">ghilton@hrc.ac.uk</a>	01992 411899
Safeguarding Officer: Maria Kellatti	<a href="mailto:mkellatti@hrc.ac.uk">mkellatti@hrc.ac.uk</a>	01992 411420
Safeguarding Officer: Robin Spicer	<a href="mailto:rspicer@hrc.ac.uk">rspicer@hrc.ac.uk</a>	01992 411974

## 6. The Governing Body

The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard children and vulnerable adults in their establishment.

In particular, the Governing Body is responsible for ensuring that:

- A nominated governor for child protection is appointed to take lead responsibility
- The College has a safeguarding policy and procedures in place, which includes safe recruitment and dealing with allegations of abuse against members of staff
- The safeguarding policy and procedure is published on the staff intranet and on the website
- A member of the Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Principal or Designated Post Holders

- Staff induction is in place with regards to child protection and safeguarding
- Appointment of an appropriate senior member of staff to act as the Designated Safeguarding Lead. It is a matter for individual schools and colleges as to whether they choose to have one or more Deputy Designated Safeguarding Leads
- Designated Safeguarding Leads (including deputies) undergo formal child protection training every two years (in line with LCSP guidance) and receive regular (annual) safeguarding refreshers (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments)
- They receive an annual report on the management of safeguarding
- Ensure all governors receive appropriate levels of safeguarding training and regularly update this training.
- Ensure the College has appropriate IT filtering and monitoring systems in place and these are regularly reviewed.

## 7. Responsibilities of all staff

The primary responsibility of staff is to refer safeguarding incidents immediately and within 24 hours. Referrals should be made via CPOMS (see appendix 1 for referral process). If a person is in immediate danger staff should speak to a member of the safeguarding team or if they cannot find a member of the team to speak to the Duty Manager, contact can be made via reception. If an immediate threat is perceived the emergency services should be contacted.

Any member of staff may raise concerns directly with Children’s Social Care services, as detailed in the [“KCSiE Information for Staff”](#).

If a member of staff has safeguarding concerns about the behaviour of staff in the college, these should be raised directly with the DSL (Vice Principal Curriculum & Quality.)

In addition to the mandatory three yearly safeguarding training and updates provided through the year, all staff must read KCSiE (2025) Part 1.

### 7.1 What college staff should look out for?

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a private foster child

## 8. Concerns

All staff and volunteers should be concerned about a child or vulnerable adult if he or she:

- Has any injury which is not typical of the bumps and scrapes normally associated with accidental injury
- Frequently has unexplained injuries (even when apparently reasonable explanations are given)
- Gives confused or conflicting explanations about how injuries were sustained
- Exhibits significant changes in behaviour, performance or attitude
- Discloses an experience in which he or she may have been abused or harmed

### 8.1 Early Help

All college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the Safeguarding Team.

The College will contribute to multi-agency working in line with statutory guidance (Working Together to Safeguard Children). The Safeguarding Team will work with and refer to relevant agencies and provide information to these agencies. This includes timely response to section 17 and 47 requests. The safeguarding team will take in to account the local criteria for action see Hertfordshire's [Continuum of Need](#). And also, be aware of Local Authorities protocol for Assessment, links to most relevant authorities below:

[Hertfordshire](#)

[Enfield](#)

[Essex](#)

### 8.2 Indicators and definitions of abuse and neglect

See Appendix 2 for full list of definitions and indicators as outlined in Keeping Children Safe in Education.

## 9. Dealing with a disclosure

If a student discloses that they have been abused in some way, the member of staff should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the student to talk freely
- Reassure the student, but do not make promises which might not be possible to keep
- Never promise a student that they will not tell anyone - as this may ultimately not be in the best interests of the student
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Pass the information to the Safeguarding team via CPOMS (Appendix 1 – referral process)

Dealing with a disclosure from a student, and safeguarding issues, can be stressful. The member of staff should, therefore, consider seeking support for him/herself and discuss this with a member of the safeguarding team.

### **9.1 Concerns in relation to 14-16 year olds**

In the event that a pre-16 school pupil discloses abuse, or a college staff member has concern for the pupil's wellbeing or a suspicion that they are being abused, they must contact the safeguarding team via CPOMS.

### **9.2 Duties of the Safeguarding Team in regard to pre-16 students**

The member of the Safeguarding Team who receives the referral must inform the Student Services Manager who is the DSL for 14-16. Where a student is linked to a school, the DSL will contact the Designated Safeguarding staff member at the school. All action taken including the actions the school intends to take must be logged on CPOMS.

### **9.3 Concerns in relation to students over 18 years**

The same procedure for students under 18 as detailed on the previous page, section 7.0 'Dealing with a disclosure' should be followed. A student over 18 may wish to involve the police. If a student decides to inform the police, the College's role is to support the student through the process and direct the student, if appropriate, to other supporting agencies e.g. counselling.

### **9.4 Concerns in relation to students with special educational needs and disabilities**

There is a concern sometimes, for children and young people with special educational needs and disabilities (SEND), that their SEND are seen first, and the potential for abuse second. If young people are behaving in particular ways or are looking distressed, or if their behaviour or demeanour is different from in the past, staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs.

The College has a duty of care towards students with SEND. If abuse is suspected or reported to a member of staff, they should follow the normal safeguarding procedures and make a referral via CPOMS.

The member of staff to whom the abuse is revealed should explain the above to the student so that the student is aware that it may not be possible to maintain confidentiality.

## **10. Confidentiality**

Safeguarding raises issues of confidentiality that must be clearly understood by all staff.

- All staff in college, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).
- If a student confides in a member of staff and requests that the information is kept in confidence, the staff member must inform the student that they cannot promise complete confidentiality. They must explain that if the information is a safeguarding concern they must inform the College's safeguarding team to help keep the student or other students safe.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional on a "need to know" basis.
- For further information please see the colleges' [confidentiality procedure](#).

## 11. Allegations involving College Staff

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child/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 s/he would pose a risk of harm if they work regularly or closely with children/vulnerable adults
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff/volunteer has contact with within their personal, professional or community life.

If an allegation of abuse is made against a member of staff/volunteer, the person receiving the allegation must report this immediately to the College Designated Safeguarding Lead (DSL), or any member of the Senior Leadership Team.

This will be dealt with through consultation with the Local Authority.

The Local Authority Designated Officer (LADO) may be contacted on 01992 555420.

### 11.1 Allegations against a member of the Senior Leadership Team or one of the Designated Safeguarding Leads in relation to a child or vulnerable adult:

If the allegation involves the DSL or a member of the Senior Leadership Team, it should be referred to the Principal. If the allegation involves the Principal, it should be referred to the Chair of the Board of the Corporation.

### 11.2 Low level concerns

The college encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. All concerns whether or not they meet the harm threshold will therefore be recorded to enable the college to build a picture of suitability over time.

Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low level concern is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult working on behalf of the college may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

- Being overfriendly with young people
- Having favourites
- Taking photographs of young people on their personal mobile phones;
- Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area, in certain circumstances this may be appropriate for safeguarding/welfare/counselling staff to do this; and/or
- Using inappropriate, intimidating, offensive or overly sexualised language.

Such behaviour exists on a spectrum from inadvertent/thoughtless or behaviour that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important therefore that concerns are shared with the DSL who will make a judgement about seriousness and where necessary seek advice from the LADO. Concerns raised about contractors and supply staff will be shared with the individual's employer and may be escalated to the LADO.

Low level concerns will be recorded in a confidential spreadsheet by the HR team. Where

necessary appropriate advice and guidance will be given to staff members in respect of how their behaviour may be interpreted by others and support offered to enable colleagues to perform their duties in line with the college's code of conduct. The advice given and by whom will be recorded confidentially.

Low level concerns will be reviewed on a half-termly basis by the DSL and the Head of HR and reported to the principal. This enables the DSL and HR team to identify concerning patterns of behaviour which may need to be escalated through college disciplinary processes or escalated to the LADO. This action will be recorded.

Low level concerns will not be referred to in references unless they have been escalated through formal disciplinary procedures or escalated to the LADO.

Whenever staff leave the college, consideration will be given as to whether or not that information needs to be kept. In making this consideration the college will make a judgement about whether any or all of the information contained may have any reasonable value in terms of historic employment or abuse claims. Where this is not the case records will be destroyed/deleted. (Appendix 7 has a flow cart for advice)

### **11.3 Safer working practice**

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the [staff code of conduct](#). Further guidance can be found at:

<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/allegations-against-staff/safer-working-practice-in-education>

### **11.4 Child on Child Abuse**

We recognise that it is not only adults that abuse young people but also their peers and this is as serious as any other form of abuse. We have a zero-tolerance approach to sexual harassment and assault. As well as referral to outside agencies such as police and social services we also have recourse to our own disciplinary system if this is deemed appropriate for perpetrators. We will always support victims and ensure a number of ways they can report abuse. Through our induction and tutorial programme we educate our students on issues such as sexual harassment, consent and county lines. Staff also remain vigilant to any form of child on child abuse and will challenge unacceptable behaviours. Under no circumstances should such behaviour be downplayed.

Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing

without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Any case of child on child abuse or suspicion of it should be reported to the Safeguarding Team via the usual routes. In the case of all child on child abuse but particularly in the case of sexual harassment and assault we maintain an attitude of 'it could happen here'. We also acknowledge that our initial response to victims is very important and they should never be given the impression that reporting it causes a problem. They should also not be made to feel ashamed for making a report. Further information and advice can be found in section 5 of KCSIE 2025.

### **11.5 Police investigations and young people**

In the event a child is questioned or detained by the police staff need to be aware that PACE Code C 2019 states the need for an "appropriate adult" to be present (usually a parent, carer or social worker). The role of this person is to support, advise and assist the young person and observe if the police are acting properly and fairly. Staff should be prepared to challenge if they feel this expectation is not being adhered to.

### **11.6 IT filtering & monitoring**

Annually (in term 1) the DSL, deputy DSL (Head of student Services) and Head of IT will meet and review the college's filtering and monitoring to ensure that we provide a safe environment to learn and work whilst online. The outcome of this review will be reported to governors and SLT via the termly safeguarding report (in term 1).

## **12. Guidelines on informing the Department for Education (DfE) on serious safeguarding incidents**

DfE has safeguarding clauses in the funding agreements and contracts. Whilst the local authority and the colleges have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. DfE's role, therefore, is to provide assurance to the SoS, in meeting their general duty, that the right organisations are taking action to keep all pupils and students safe.

## 12.1 Informing ESFA about serious safeguarding concerns

Serious safeguarding concerns inc PREVENT	Who should inform DfE	Information to be sent to DfE
If HRC is the subject of an investigation by the local authority or the police	One of following three: Chair of Governor Principal Senior designated safeguarding lead	Name of the institution, Nature of the incident Confirmation that incident is, or is scheduled to be investigated by the local authority and/or the police
Safeguarding cases involving sexual violence involving a funded student at college or with a sub-contractor which is referred to either the police or Local Authority. Or if a student is referred to the Channel Panel, Also if an allegation is made against a member of staff and the LADO is informed.	Senior designated safeguarding lead	Email: <a href="mailto:Enquiries.EFA@education.gov.uk">Enquiries.EFA@education.gov.uk</a> Or use the below portal: <a href="#">contact DfE online</a>
HRC or one of its subcontractors, is the subject to investigation by the local authority or the police in connection with a Prevent issue	One of three: Chair of Governor Principal Senior designated safeguarding lead	

DfE will not ask for, or require any information that could be used to identify individuals or any information that will impact on your data protection duties. They also will not require colleges to routinely inform them about Prevent referrals to channel panels.

Once DfE has been alerted that a serious safeguarding incident has taken place they will ensure the SoS is made aware. DfE will then liaise with the organisations that have the primary duty. DfE will take the action they deem necessary in accordance with the funding agreement.

Colleges will only need to notify DfE that a referral has been made, no other information is required.

## 12.2 Providing DfE with quality improvement activity in advance of an Ofsted inspection, and informing us about provisional and interim inspection grades

DfE has an additional clause to enable them to request this information which will be requested in very exceptional cases.

DfE will ask for interim and provisional inspection grades again only for exceptional cases where they reserve the right consider it necessary to take action in advance of publication. This might be, for example, where DfE deem it appropriate to take interim actions to protect the health, safety and wellbeing of students.

## 12.3 Receiving and sharing safeguarding records

The sending school or college should send any relevant safeguarding records on to HRC within 5 days of enrolment at the College. After the first 6 weeks of the academic year (once we have completed the probationary period) the Student Services Manager will mail all sending institutions to request records in case the initial transfer of records has not happened or has been incomplete. In most cases we are the final destination for students and do not need to transfer records on, however, when made aware we will transfer relevant records on to appropriate institutions.

### 13. Staff Training and Induction

We aim to equip all staff involved in contact with vulnerable learners to be able to complete their work effectively. All staff who work at the college must receive safeguarding training whether delivered internally or externally e.g. sub contracted services such as security, catering etc.

Staff	Managers	Safeguarding Team	SLT Lead	Governors
Children and Vulnerable Adults as part of induction in first 3 months. Refresher training every three years. Staff also receive regular in year updates on safeguarding topics.	Same as staff	Same as staff plus DSL training via Hertfordshire Safeguarding Children Board, refreshed every 2 years.	As managers plus DSL training via Hertfordshire Safeguarding Children Partnership, refreshed every 2 years.	Governor safeguarding and Prevent induction Refresher training every 3 years.
Prevent Awareness Training as part of induction in first 3 months, refresher training provided every three years. Staff also receive regular in year updates on Prevent.	Same as staff Safer recruitment training	Same as staff, plus external conferences	Managing allegations against staff (HSBC)	Governor safeguarding and Prevent induction  Refresher training every 3 years

# Prevent

## 1. Introduction

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting from other forms of harm and abuse, protecting children from this risk should be a part of a colleges' safeguarding approach.

The governments definition of Extremism Radicalisation and Terrorism (these are currently under review by the government)

- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - 
  - (1) negate or destroy the fundamental rights and freedoms of others; or
  - (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

## 2. Awareness of the Prevent Agenda

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism.” This is known as the Prevent Duty.

Prevent is one of the four elements of 'CONTEST', the government's counter terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to safeguard people from becoming terrorists or supporting terrorism.

The recent Contest 3.0 strategy states “Protecting pupils and students from radicalisation is part of the wider safeguarding duties of teachers, tutors and academics. The Prevent duty requires education providers to have clear policies in place to safeguard students and build their resilience to radicalisation in schools, further and higher education institutions.”

The Prevent strategy has 3 key objectives:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism
- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
- Enable those who have already engaged in terrorism to disengage and rehabilitate

### **3. HRC practice which contributes to Prevent**

#### **Information Technology**

The College has in place an IT Acceptable Use Policy which applies to all use of all IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that arise from the FE statutory duty under the Counter Terrorism and Security Act 2015.

#### **Partnership Working**

The College places a priority on working with partners to ensure we provide a safe environment. We work in collaboration with our local HE and FE Prevent Coordinator and local police and key external agencies to share information, intelligence and best practice. Head of Student Services attends Hertfordshire Channel Panel every three months and receives the quarterly Eastern Region Counter Terrorism Local Profile.

#### **External Speakers and Events**

Existing procedures for the management of external speakers and events are outlined in the [Guest Speaker Protocol](#).

#### **Staff training**

All staff receive Prevent awareness training as part of their induction and three yearly refreshers.

#### **Space for prayer and reflection**

The College is a secular organisation which seeks to ensure an inclusive approach to students and staff of all faiths and none. There are rooms available on both campus that provide space for prayer and reflection. A [Quiet Room protocol](#) is in place for appropriate use of this space.

#### **Student Awareness**

Mandatory components of our tutorial programme include British Values, e-Safety, Run Hide Tell etc. This is also included in our Induction modules that all students are expected to complete. Posters have been distributed around the College to raise students' awareness of what to do if they have any concerns as well as posters on the ways British values are embedded in different aspect of the student experience at the college.

#### **Equality and Diversity**

Our work on Equality and Diversity within the curriculum and Enrichment contribute to good community relations and reduces the risk of radicalisation.

#### **Prevent Duty Risk Assessment and Action Plan**

In order to effectively support the implementation of the Prevent agenda the College has developed a Prevent Action plan which is reviewed and updated half-termly by the Safeguarding Advisory Group and shared with SLT half-termly.

### **4. Understanding and recognising risks and vulnerabilities and radicalisation**

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead making a referral to the Channel

programme.

There is no single way of identifying whether a student is likely to be susceptible to an extremist ideology or radicalisation.

The ways in which young people can be influenced include:

- via family members or friends
- direct contact with extremist groups
- contact via the internet

Examples of extremist causes that have used violence to achieve their ends include:

- animal rights
- the far right
- internal terrorism
- international terrorist organisations

Additional indicators for vulnerability to radicalisation:

- family tensions
- sense of isolation
- migration
- distance from cultural heritage
- experience of racism or discrimination
- feeling of failure.

Other behaviours to be aware of:

- involved with a new group of friends
- searching for answers to questions about identity, faith and belonging,
- possessing extremist literature
- advocating violent actions
- changing behaviour and language
- seeking to recruit others to an extremist ideology

It is important to note that children and young people experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour, and it is important to be cautious in assessing these factors to avoid inappropriately labelling or stigmatising individuals because they possess a characteristic or fit a specific profile.

## **5. Referral and intervention process**

Any member of staff at HRC who have any concerns about students who may be at risk of radicalisation or involvement with violent extremism should make referrals to the safeguarding team in the usual way via CPOMS.

### **5.1 Channel Process**

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour and forms a key part of the Prevent strategy. Members of a Channel panel include the police, social workers,

local authorities, community groups etc. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. See appendix 4 for Channel referral process.

The College will follow the recommended Channel guidance to assess vulnerability based around three criteria:

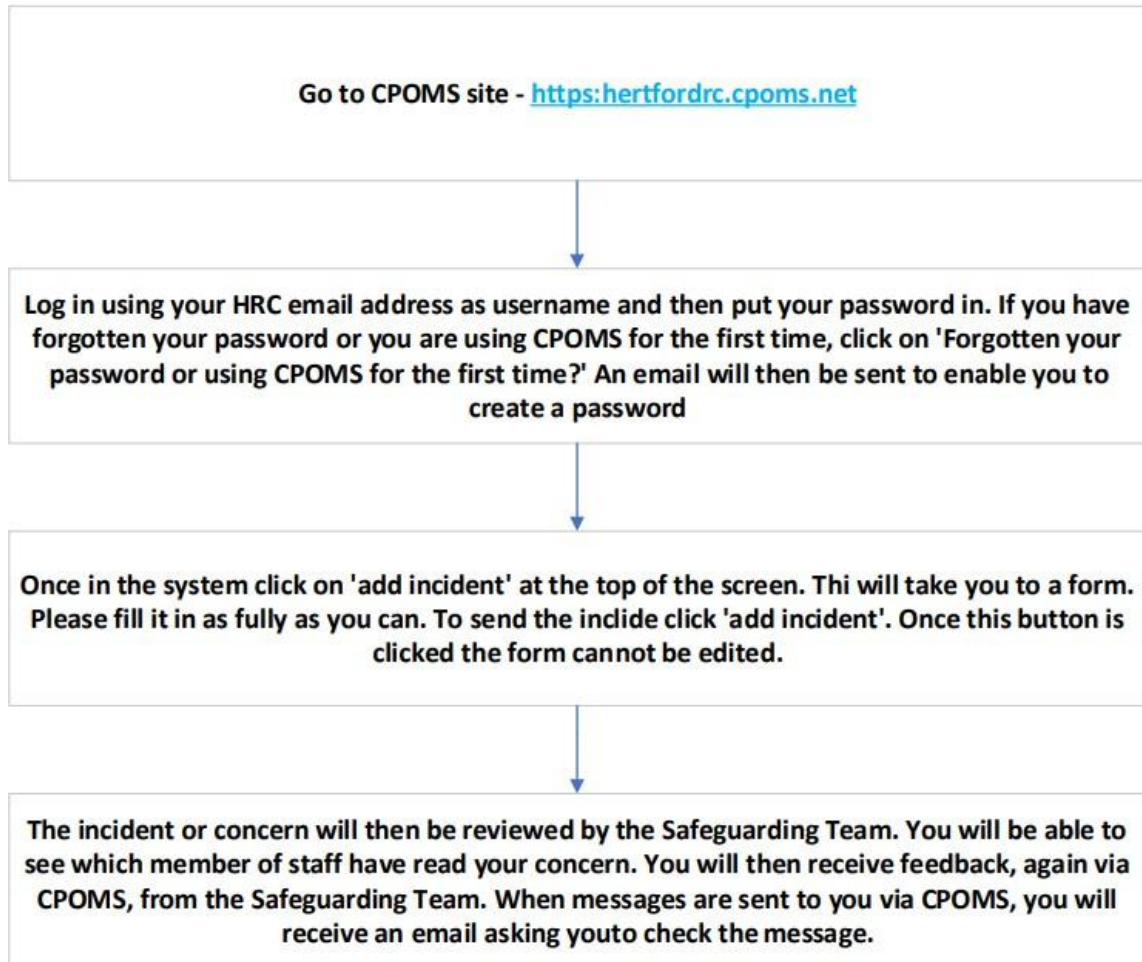
- Engagement with a group, cause or ideology
- Intent to cause harm
- Capability to cause harm

In all cases we would liaise with the police and other agencies for further advice and guidance.

Further guidance can be found in the statutory guidance for Channel panel members and partners of local panels:

[HM Government Channel Duty Guidance](#)

## Appendix 1 – Referral Process



## **Appendix 2 - Definitions, Signs and Indicators of Abuse**

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. 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. They may be abused by an adult or adults or by another child or children.

### **Physical abuse:**

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

### **Emotional abuse:**

This is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse:**

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

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

**Neglect:**

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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 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.

**Additional Abuse/Safeguarding Issue****Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**Children and the court system**

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

**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 such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures. Please see Missing Education Protocol (Appendix 6).

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [www.nicco.org.uk](http://www.nicco.org.uk) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘traphouse or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

## **Modern Slavery and the National Referral Mechanism**

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk)).

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

## **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

## **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK](#) domestic abuse signs symptoms effects

[Refuge](#) what is domestic violence/effects of domestic violence on children

[Safe young lives](#): young people and domestic abuse

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be 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 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. In most cases school and 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 (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ violence (HBV) encompasses incidents or 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. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM mandatory reporting duty for teachers**

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 along with regulated health and social care professionals in England and Wales, 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.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers 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 school or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate.

### **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 communities use religion and culture as a way to coerce a person into marriage.

Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.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.

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the Revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

#### Additional support

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

<https://www.educateagainsthate.com/>

College staff should be aware of signs of radicalisation and have the confidence to report their concerns to the Safeguarding Team.

The College will also promote the ethos of the '**Prevent**' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.

The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.

The college has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the college and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the college and could constitute misconduct.

The College will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation.

#### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance.

#### Additional support

The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

### **Child on Child abuse**

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### **Sexual violence and sexual harassment between children in schools and colleges** **Context**

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.

It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- 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”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting upskirts. Dismissing or tolerating such behaviours risks normalising them.

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. 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.

#### **Causing someone to engage in sexual activity without consent:**

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

#### **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: consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence; sharing of unwanted explicit content; upskirting (is a criminal offence); sexualised online bullying; unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.

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
- Upskirting

### **Upskirting**

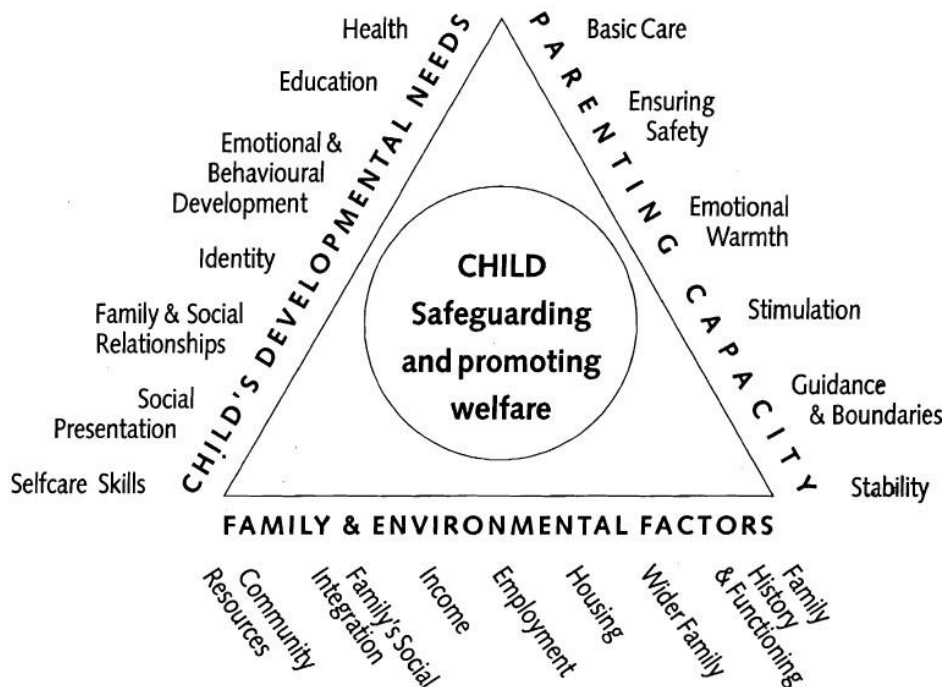
The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process of the College. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

### Appendix 3 – The framework for understanding children’s needs



#### Working Together to Safeguard Children (DFE, 2015)

<b>Physical abuse</b>	
<i>Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.</i>	
<b>Child</b>	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injurie	Fabricated or induced illness
<b>Parent</b>	<b>Family / environment</b>
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.
Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	

### Emotional abuse

***Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, not giving the child opportunities to express their views, 'making fun' of what they say or how they communicate - hearing the ill-treatment of another and serious bullying (including cyber bullying).***

<b>Child</b>	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
<b>Parent</b>	<b>Family / environment</b>
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

<b>Neglect</b>	
<i>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.</i>	
<b>Child</b>	
Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships
<b>Parent</b>	<b>Family / environment</b>
Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	

<b>Sexual abuse</b>	
<i>Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities, such as involving children in looking at sexual images or being groomed online / child exploitation.</i>	
<b>Child</b>	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	
<b>Parent</b>	<b>Family / environment</b>
History of sexual abuse	Marginalised or isolated by the community.
Excessively interested in the child.	History of mental health, alcohol or drug misuse or domestic violence.
Parent displays inappropriate behaviour towards the child or other children	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Conviction for sexual offences	Past history in the care of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Comments made by the parent/carer about the child.	Grooming behaviour
Lack of sexual boundaries	Physical or sexual assault or a culture of physical chastisement.

**Appendix 4 – CHANNEL Referral Process**

**CHANNEL**  
 {Panel meets every 4 weeks),

Hertfordshire Prevent  
 Co-Ordinator

Vice Prii1ncipal Cunkullum and  
 Quality **SPOC** (Single Point of  
 Contact)

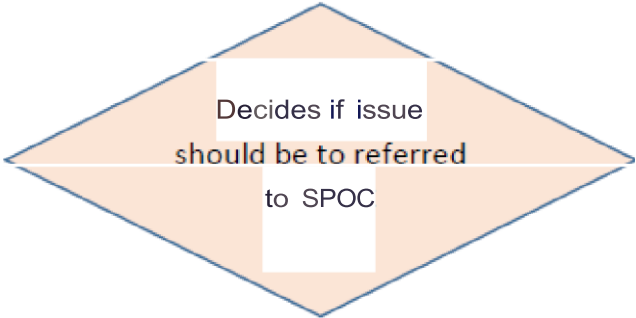
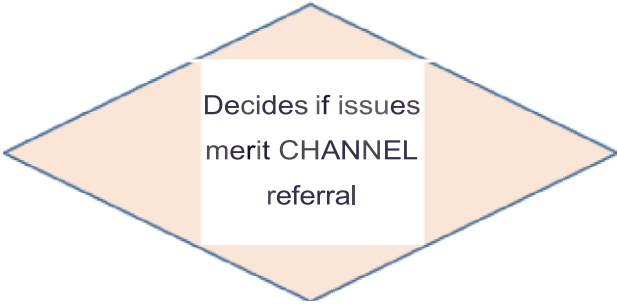


Designated Safeguarding Lead

Safeguarding team



HRC staff member with concern



## Appendix 5 – Missing Educational Protocol

This Protocol is in place to help safeguard the learners of HRC and help identify any issues that may be affecting learner's attendance. In general, it is expected that personal tutors will attempt first contact with students who are absent, only students who are absent with no reason for two weeks will be checked by the Safeguarding team. The process is as follows:

- A weekly report is run by MIS to show any student who has unauthorised absences for over two weeks, this is sent to the Student Services Manager (SSM).
- The SSM will then pass the list to the Progress Monitors who will carry out checks on the students from the campus they work on.
- Progress Monitors will first check Promonitor and contact tutors to ascertain if there is a known reason for absence.
- Progress Monitors can check prosolution to see if a withdrawal request has been made.
- If concerns remain the Progress Monitor will log concern on CPOMS and Promonitor.
- If Progress Monitor is informed that the student planned to be withdrawn, they should refer to careers advisors who will make contact.
- The safeguarding team will first attempt to contact the learner and then if contact can't be made the emergency contact for the learner. If contact can still not be made with a learner who is 16 or 17, the safeguarding officer will then inform the local authorities Child Missing Education Officer (Herts 01992 556867, Enfield 020 8379 3745 & Essex 03330 322 962)
- If there are safeguarding concerns the appropriate authorities should be contacted i.e. LSCB, police.
- If the learner is 18 or over and there are serious safeguarding concerns appropriate authorities should be contacted i.e. LSAB, police.
- If a learner informs they are dropping out of college, Academic department and careers advisors should be informed and if appropriate local authority services that can support.
- Progress Monitor to summarise information received and actions taken and return this to Student services manager who will then share with Directors and Head of Student Services.

## Appendix 6 – Guidance for lone working / contacting students

In the course of the work of the Safeguarding and Welfare team there will be times when staff will work on one-to-one with students discussing private and sensitive issues. Also contact will be made over phone, text or Teams messenger. The below guidelines are in place to help ensure the safety of both students and staff.

- In general, these should be with the consent of the student and they should be reminded of the voluntary nature of such meetings.
- Although on occasion where there are serious concerns for the safety of the individual or if there is the need to remove them from a situation that is escalating the staff member may insist the student attend.
- In such a case as soon as possible another member of staff should attend, the reason for the meeting explained to student and the reasoning recorded on CPOMS.
- We respect the right for students to decline the opportunity to work with student services.
- If possible meetings should be arranged when they are not in lesson, although this is not always possible.
- Meetings should take place in a room that has a window, this may be blurred to give privacy, also the student should be positioned so they feel they are able to leave and their access to the exit is unimpeded.
- Discussions had should be written up on CPOMS.
- On occasion, students may be left for some time to calm down, which may include some mindfulness activities to help this process.
- Staff lone working should have access to means of communication such as mobile or laptop so they can call for assistance.

### Contact via Teams/college mobile

- Contact should only be made using college resources wither using Teams or using college mobile phones.
- Any contact should be recorded on CPOMS, Teams messenger conversations should be copy and pasted or summarised into CPOMS.
- On occasion it may be felt necessary to make contact outside of normal college hours, this for example may be to check an upset student got home ok, to check in on a student struggling emotionally over a weekend or holiday period.
- It should be discussed with members of the safeguarding team and the reasoning for such contact noted on CPOMS.
- In the case of pre-arranged check-ins this should also be done with the consent of the student concerned.

### Giving of Equipment/other support

- If students are given equipment or other extra support this should be recorded.
- If for example a laptop is given this should be recorded via the root it is given (ie info centre) but also on CPOMS.
- If using the ALS foodbank or the Christmas gifts the ALS team give or mindfulness aids such as pens/books these should be recorded in this Team so a clear record is kept.

## Appendix 7 – Low Level Safeguarding Concerns – Internal Process

