

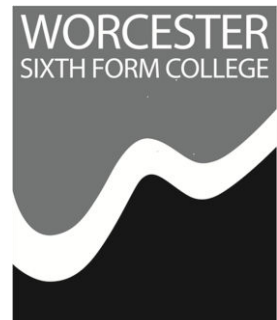
# ***Worcester Sixth Form College***

## ***Safeguarding Children Policy (including Child Protection)***

This policy is reviewed at least annually by the governing body and was last reviewed on

Date: 10<sup>th</sup> September 2025

Next Review Date: September 2026



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## **Safeguarding Key Personnel**

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### **Designated Safeguarding Lead Graham Williams\*\***

email: [graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk)

Telephone: 01905 362612

### **Safeguarding Officer Heather Anderson-Stevens\*\* (CLA learners)**

email: [heather.anderson-stevens@wsfc.ac.uk](mailto:heather.anderson-stevens@wsfc.ac.uk)

Telephone: 01905 362614

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### **The Deputy DSLs are**

#### **Ellie Clayton\*\***

[eleanor.clayton@wsfc.ac.uk](mailto:eleanor.clayton@wsfc.ac.uk)

Telephone: 01905 362615

#### **Michelle Collings\*\***

[michelle.collings@wsfc.ac.uk](mailto:michelle.collings@wsfc.ac.uk)

Telephone: 01905 362617

#### **Catherine McPherson\*\***

[catherine.mcpherson@wsfc.ac.uk](mailto:catherine.mcpherson@wsfc.ac.uk)

Telephone: 01905 362626

#### **Rachel Briggs\*\* (High Needs learners)** email: [rachel.briggs@wsfc.ac.uk](mailto:rachel.briggs@wsfc.ac.uk)

Telephone: 01905 362625

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### **The nominated safeguarding governor is Elle Beale**

email: [jo.payne@wsfc.ac.uk](mailto:jo.payne@wsfc.ac.uk) (Clerk to the Gov Body)

Telephone: 01905 362600

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### **The Principal is Ed Senior**

email: [ed.senior@wsfc.ac.uk](mailto:ed.senior@wsfc.ac.uk)

Telephone: 01905 362600 ext 602 (Jo Payne, PA to the Principal)

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### **The Chair of Governors is Sean Devlin**

email: [jo.payne@wsfc.ac.uk](mailto:jo.payne@wsfc.ac.uk) (Clerk to the Gov Body)

Telephone: 01905 362600 ext 602 (Jo Payne, Clerk to the Gov Body)

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### **Other staff on safeguarding team**

#### **Catherine Power\*\* (College counsellor)**

#### **Sam Murphy\*\* (Mental Health & Wellbeing Officer)**

Telephone: 01905 362600 ext 635 (student services)

#### **Pastoral tutors**

E-mail: [tutorialhub@wsfc.ac.uk](mailto:tutorialhub@wsfc.ac.uk)

Telephone: 01905 362611

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### **Designated Teacher for Children in Care**

#### **Graham Williams**

e-mail: [graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk)

Telephone: 01905 362612

### **Online Safety Co-ordinator**

#### **Carl Rusby**

email: [carl.rusby@wsfc.ac.uk](mailto:carl.rusby@wsfc.ac.uk)

Telephone: 01905 362633

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\*\* = Member of Protection Team, chaired fortnightly by Graham Williams to manage protection cases, agree and record actions and discuss other College safeguarding issues. It also reviews lessons learnt from individual cases and makes recommendations for improvements.

## Other named contacts:

### Safeguarding in Education Adviser, WCC

Denise Hannibal [dhannibal@worcestershires.gov.uk](mailto:dhannibal@worcestershires.gov.uk)

Tel No: 01905844436 Mobile: 07825531295

Hayley Doyle [HDoyle@worcestershires.gov.uk](mailto:HDoyle@worcestershires.gov.uk)

Tel no: 01905 845230

### Local Authority Designated Officer

Tel: 01905 846221 [LADO@worcestershires.gov.uk](mailto:LADO@worcestershires.gov.uk)

**Family Front Door:** Tel: **01905 822666** (core working hours) Out of hours or at weekends: 01905 768020

**To submit an online Cause for Concern notification log onto:**

[www.worcestershires.gov.uk/](http://www.worcestershires.gov.uk/)

[http://www.worcestershires.gov.uk/info/20559/refer\\_to\\_childrens\\_social\\_care/1658/are\\_you\\_a\\_professional\\_and\\_worried\\_about\\_child](http://www.worcestershires.gov.uk/info/20559/refer_to_childrens_social_care/1658/are_you_a_professional_and_worried_about_child)

## Safeguarding Statement

Worcester Sixth Form College recognises our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where students are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that students receive effective support, protection and justice. Child protection forms part of the College's safeguarding responsibilities.

## Purpose and Aims

**The Purpose of the Safeguarding Policy is to set out the College's response to our statutory and moral responsibility to safeguard and promote the welfare of students.**

We will ensure we facilitate a whole College approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the best interests of the child at their heart. Where there is a safeguarding concern, the Local Governing Body, the DSL and College leaders will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Safeguarding Policy applies to all staff, governors and volunteers and all activities provided by the College. An outline of the main sources of statutory duty, non-statutory guidance which inform the policy are listed in *Appendix 1* and definitions of key terms are listed in *Appendix 2*.

## Our Commitment

We will ensure arrangements are in place to safeguard and promote the welfare of students by:

- Creating a culture of safeguarding by embedding robust policies and procedures where students feel secure, are encouraged to talk and are listened to;

- Maintaining a 'Zero Tolerance' approach to child-on-child abuse, including sexually harmful behaviour, racism and homophobia;
- Ensure all students know who they can approach at College if they have concerns;
- Teaching students to keep themselves safe from all forms of abuse, including: child sexual exploitation, criminal exploitation, female genital mutilation, forced marriage, extremism, radicalisation and child-on-child abuse.

#### **And we will support our staff by:**

- Providing effective, ongoing training and development for all staff.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage, including the acceptance of the regulation around mandatory reporting.
- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection, proactively sharing information as early as possible to support students and their families.
- Monitoring and supporting students who are subject to child protection plans, contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about students, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely. Records will include:
  - A comprehensive summary of concerns.
  - Details of the concern.
  - What action was taken and any follow-up.
  - Actions taken and outcomes.
- Ensuring the suitability of all staff through safe recruitment practice.
- Ensuring all our staff and volunteers understand their responsibilities with regard to safeguarding and child protection through annual training and CPD training events.
- Ensuring that parents and carers understand the responsibility placed on the College and its staff for safeguarding and child protection.
- Maintaining clear procedures for reporting Low Level Concerns and allegations against staff members.

We recognise that students who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. College **may** be the only stable, secure, and predictable element in the lives of children at risk. We will support all our students through:

- Appropriate staff conduct, in line with the policy.
- Relevant curriculum design and implementation to teach students about staying safe at all times, including when they are online.
- Consistent implementation of our Health & Safety, Anti-bullying, Safer Recruitment, Behaviour and Online safety policies and related practice.
- Close and proactive liaison with other agencies such as social services, Child and Adult Mental Health Service, the Education Welfare and Psychology Services.

In line with Government guidelines in KCSIE 2025, we **will** where reasonably possible, hold two or more emergency contact numbers per student.

This policy aims to:

- Demonstrate the College's commitment to safeguarding.
- Draw attention to the breadth of the responsibility.
- Outline how the responsibilities shall be met.
- Inform all members of the College community about their responsibilities and the principles and procedures to follow in practice.
- Inform all members of the College community about the support available and how to access it.
- Promote a safe and vigilant working environment.

## Key Principles

The following principles underpin decisions and actions as regards safeguarding.

- The welfare of the student is paramount and our approach is student centred and aims to achieve the best outcome for the student. This includes anyone under the age of 18, emphasising the prominence of exploitation, adultification and teenage relationship abuse.
- Wherever possible, students are fully involved in plans to safeguard and promote their welfare and individual decisions are informed by the wishes, feelings and experiences of students
- The College seeks to ensure equality in dealing with safeguarding matters.
- HR aim for best practice in related employment matters.
- All staff have a responsibility to act on any suspicion, rumour or disclosure that may suggest that a student is at risk of *harm* from *abuse*.
- Students and staff involved in *protection* cases receive appropriate support.
- College practice is informed by Worcestershire Children Safeguarding Partnership (WSCP) and 'Keeping Children Safe in Education (2024)
- Our response to concerns about *need* or *protection* is seen as an ongoing process rather than the management of an event.
- Working with other agencies is valued and matters surrounding information sharing and confidentiality are informed by WSCP protocols.

This policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2020 Education Act, The Education (Independent College Standards) Regulations 2014 (for independent colleges), the Non-maintained Special Colleges (England) Regulations 2015 (for non-maintained special colleges) and the guidance contained in [Working together to safeguard children 2024: statutory guidance \(publishing.service.gov.uk\)](#), the DfE's statutory Guidance "[Keeping Children Safe in Education 2025](#), Ofsted guidance and procedure,

Keeping Children Safe in Education 2025 also covers 16-19 academies (and apprenticeships). There is reference to the Education and Training (Welfare of Children) Act 2021 which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 and places safeguarding duties on 16 to 19 academies and further education to ensure that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.

Section 175 of the Education Act 2002, which places a duty on colleges and local authorities to safeguard and promote the welfare of pupils

The College Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a college interview/appointment panel to be trained in safer recruitment techniques

Part 3 of the schedule to the Education (Independent College Standards) Regulations 2014, which places a duty on academies and independent colleges to safeguard and promote the welfare of pupils at the college

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains colleges' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism [West Mercia Consortium inter-agency procedures](#) and the [WSCP Levels of Need Guidance](#).

We have regard to the DfE statutory guidance 'Relationships education, relationships and sex education (RSE) and health education' (June 2019) by including opportunities in the curriculum, specifically through PSHE and ICT, for students to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

This policy applies to all staff, governors, volunteers and visitors to the College. Child protection is the responsibility of all staff. We ensure that all parents and working partners are aware of this policy by mentioning it in our College prospectus, displaying appropriate information in our reception and on the College website and by raising awareness at meetings with parents/carers.

Our staff are aware of:

[West Midlands procedures:](#)

[WCC levels of need guidance:](#)

### **Raising concerns/complaints.** (Refer to Trust Whistleblowing Policy)

We respond robustly when concerns are raised or complaints made (from students, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. The College will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The College's complaints policy is available on our website [www.wsfc.ac.uk](http://www.wsfc.ac.uk)

All our staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Trust's Whistleblowing policy.

Whistleblowing concerns about the Principal should be raised with the Chair of the Trust.

NSPCC's whistleblowing advice line dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by Trust.

Staff can call 0800 028 0285 – line is available from 8:00 am to 8:00 pm, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

[NSPCC - When to call the police](#)

Statutory guidance contains further information on : [The Role and Responsibilities of the Designated Teacher](#)

A record of any allegations (proven) made against staff is kept in a confidential file by the Principal.

### **Roles and responsibilities**

**The College Principal** will ensure that:

- The Safeguarding policies and procedures adopted by the Local Governing Body are effectively implemented and followed by all staff.
- Recruitment and personnel aspects of Safeguarding are implemented
- Designated person management of allegations against staff are managed
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead, Safeguarding Officer and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- Safeguarding is fully incorporated within Health and Safety procedures and advise SLT on premises and equipment issues relating to Safeguarding
- Allegations of abuse or concerns that a member of staff or adult working at college may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer in a timely manner.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).

- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns (including low level concerns) and that if all else fails to report these directly to Children's Social Care (Children's Services) or the Police.

**The Designated Safeguarding Lead** has lead responsibility for safeguarding and child protection (including online safety). This DSL role is explicit in their job description and they have the appropriate times and resources to carry out their role. We also have deputy DSL/s who have been trained the same as our DSL. In addition to our formal DSL training, their knowledge and skills will be updated (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with our DSL. This responsibility will not be delegated. The DSL, Safeguarding Officer and any deputies will liaise with the safeguarding partners, and work with other agencies in line with Working Together to safeguard children will help our DSLs understand when they should consider calling the police and what to expect when they do.

During term time, our DSL and/or Safeguarding Officer/a deputy will always be available (during college or college hours) for staff in the college or college to discuss any safeguarding concerns. Where appropriate the DSL and Safeguarding Officer will ensure adequate and appropriate cover arrangements for any out of hours/out of term activities.

The Designated Safeguarding Lead is supported by the Safeguarding Officer who takes responsibility for day-to-day safeguarding matters, supporting students, making referrals as appropriate and liaising with external agencies.

## **All staff**

All adults working with or on behalf of students have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the College (Safeguarding Officer, DSL and Deputies). The Teachers' Standards 2012 state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their decisions about individual children. All staff are aware of systems within our College which support safeguarding, and these are explained to them as part of staff induction. This includes:

- safeguarding/child protection policy.
- student conduct policy (which should include measures to prevent bullying, including cyberbullying),
- Child on child abuse policy
- staff code of conduct policy
- safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- Copies of policies and a copy of Part one (or Annex A in Keeping Children Safe 2025 if appropriate) of this document is provided to staff at induction and annual staff training.
- All our staff will receive appropriate safeguarding and child protection training (including online safety) at induction and annually thereafter. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All our staff will be aware of their local early help process and understand their role in it.

- All our staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17(children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All our staff know what to do if a child tells them he/she is being abused, exploited, or neglected. All our staff should be aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Safeguarding Officer (or DSL/DDSL in their absence) if they have concerns about a student. It is also important that staff determine how best to build trusted relationships with young people which facilitate communication. Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Safeguarding Officer (or designated safeguarding lead or a deputy) and children's social care. Staff never promise a student that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the student. All staff wear lanyards clearly identifying them as staff. They are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned and '*think beyond the obvious*'. When concerned about the welfare of a student, staff members should always act in the interests of the student and have a responsibility to take action as outlined in this policy. They take account of the '*one chance rule*' in relation to honour violence based issues, that an adult may have only one opportunity to save a potential victim.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the Safeguarding Officer (or designated safeguarding lead or a deputy) to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect. In every office is a flow chart, and staff have access to the portal in order to raise a concern. All our staff are able to reassure victims that they are being taken seriously and that they will be supported and kept safe. If staff have any concerns about a child's welfare, we act on them immediately.

Staff should actively promote the safety and well-being of students through curriculum.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the College's Managing Allegations Policy and the Trust's whistleblowing policy.

## Local Governing Body

In accordance with the Statutory Guidance "Keeping Children Safe in Education" September 2025, the Local Governing Body will ensure that:

- The College has a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly on our website.
- The policy should be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
- Governors have an enhanced criminal records certificate from the DBS. We carry out a Section 128 check for college governors, because a person subject to one is disqualified from being a governor.
- The College operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Principal, a nominated Governor and other staff involved in the recruitment process have undertaken Safer Recruitment Training.

- There are procedures for dealing with allegations of abuse against members of staff and volunteers/ people in a position of trust.
- There is a senior member of the College's leadership team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after College and out of term activities.
- The Designated Safeguarding Lead undertakes effective Local authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- The Principal, and all other staff and volunteers who work with students undertake appropriate training which is regularly updated (at least every year); and that new staff and volunteers who work with students are made aware of the College's arrangements for child protection and their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education 2025). Staff training includes indicators of FGM; early signs of radicalisation and extremism; indicators of vulnerability to radicalisation.
- Any deficiencies or weaknesses in these arrangements brought to the attention of the Local Governing Body will be rectified without delay.
- The Trust CEO and/or Chair of the Trust (or, in the absence, the Vice Chair) deals with any allegations of abuse made against the Principal, with advice and guidance from the Local Authority Designated Officer (LADO).
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers – "[Professional and Personnel Relationships \(safeguardingchildren.co.uk\)](https://www.safeguardingchildren.co.uk/professional-and-personnel-relationships)
- Information is provided to the Local Authority (on behalf of the WSCP) when requested, for example through the Annual Safeguarding Return (e.g. section 175 audit).
- Students are taught about safeguarding, including online safety as part of the pastoral programme and the curriculum.
- There is Safeguarding Governor who will champion issues to do with safeguarding children and child protection within the College, liaise with the Designated Safeguarding Lead, and provide information and reports to the Governing Body.
- The College contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2023 including providing a co-ordinated offer of Early Help for students who require this. This Early Help may be offered directly through College provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).
- GDPR- Our Local Governing Body are aware that among other obligations, [the Data Protection Act 2018](#) and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure in [Data protection: toolkit for colleges](#) .
- The College complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. In conjunction with the Principal and DSL we assess the level of risk within the College and put actions in place to reduce that risk.

We will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our College are effective.

## Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Guidance to help colleges and Colleges understand how the Equality Act affects them and how to fulfil their duties under the act can be found at [Equality Act 2010: advice for colleges](#). For further information on The Equality Act guidance | Equality and Human Rights Commission see following [link](#).

## **Information Sharing**

Worcester Sixth Form College recognises the importance of information sharing between practitioners and local agencies. We have ensured arrangements are in place, that set out clearly the processes and principles for sharing information within our college and with WCC children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

In our College our staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

The Local Governing Body is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

This includes:

- processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Where we would not provide personal data where the serious harm test under the legislation is met, for example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we must withhold providing the data in compliance with colleges' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt we would seek independent legal advice.

Staff understand, The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

## **Records, Monitoring and Transfer**

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a student within the College. The record should include the student's words as far as possible and should be timed, dated and signed. All staff have access to the portal in order to raise a concern, which should be done as soon as possible as a priority. The Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) is responsible for such records and for deciding at what point these records should be passed over to other agencies.

Where students leave our College, the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the young person arrives. The Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) will ensure secure transit, and confirmation of receipt should be obtained, this will be transferred separately from the main pupil file.

The receiving schools and colleges should ensure key staff such as DSLs and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

Records relating to actual or alleged abuse or neglect are stored electronically away from normal student or staff records and marked as 'highly sensitive'. These have restricted access by designated safeguarding staff. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

Child protection paper records are stored securely in a locked cupboard, with access confined to specific staff, Safeguarding Officer, Designated Safeguarding Leads and the Principal.

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in safeguarding notes on our inhouse electronic safeguarding system. Information is kept confidential and stored securely this way, with access for safeguarding personnel, on a need to know basis only.

A record of any allegations (proven) made against staff is kept in a confidential file by the Principal.

Records include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.
- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Child protection records are reviewed regularly to check whether any action or updating is needed.

When students transfer from our College the safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly via secure electronic method to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover for paper files not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, will be copied.

### **Filtering and Monitoring**

The College's Local Governing Body will ensure that the College has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that an appropriate senior member of staff, from the Senior Leadership Team, is appointed to the role of Designated Safeguarding Lead. It is not appropriate for the proprietor to be the Designated Safeguarding Lead. The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This is explicit in the job description of the Designated Safeguarding Lead.

The Local Governing Body will ensure the DSL has the appropriate status and authority within the College to carry out the duties of the post. The College ensures that all staff undergo safeguarding and child protection training. The training will be updated regularly. Induction and training will be in line with any advice from safeguarding partners.

The appropriateness of the College's filtering and monitoring systems will be informed, in part by the risk assessment required by the Prevent Duty.

In accordance with the Department for Education's guidance on filtering and monitoring standards, the College will:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems;
- Review filtering and monitoring provision at least annually;
- Block harmful and inappropriate content without unreasonably impacting teaching and learning;
- Have effective monitoring strategies in place that meet safeguarding needs.
- Use the department's '[plan technology for your school service](#)' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

[The Prevent duty Departmental advice for schools and childcare providers](#) and Home Office Additional guidance on filtering and monitoring can be found at: [UK Safer Internet Centre: "appropriate" filtering and monitoring](#).

The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

## Early Help

Any student may benefit from early help. The safeguarding team are experienced and appropriately trained to early identify the potential need for early help for a student who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- has experienced multiple suspensions, is at risk or being permanently excluded from schools, colleges and in alternative provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves.
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the college day.

Our Early Help Offer is accessible on our [website](#), and as part of our early offer, we support young people by completing an early help assessment.

[Worcestershire County Council Early Help Information Page](#)

## Multi Agency Working

In our College we have a pivotal role to play in multi-agency safeguarding arrangements. Our Local Governing body ensures that we will contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children

In our College our leaders/local governing body understand our local safeguarding arrangements and work with partners from Worcestershire Children's Safeguarding Partnership WSCP to safeguard and promote the welfare of local children, including identifying and responding to their needs. The Worcestershire County Council (WCC) Head teacher safeguarding steering group who is represented by all phases of education are part of our WSCP and make all colleges/colleges aware and follow the local arrangements for local protocol and assessment policies and procedures. We are also prepared to supply information as requested by the safeguarding partners.

Our College works with WCC social care, the police, health services and other services to promote the welfare of students and protect them from harm. This includes providing a coordinated offer of early help when additional needs of students are identified and contributing to inter-agency plans to provide additional support to students subject to child protection plans.

In our College we allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

A diagram that illustrates the different roles of the Protection Team can be seen below:

## **Safeguarding and Pastoral Support Levels of Need**

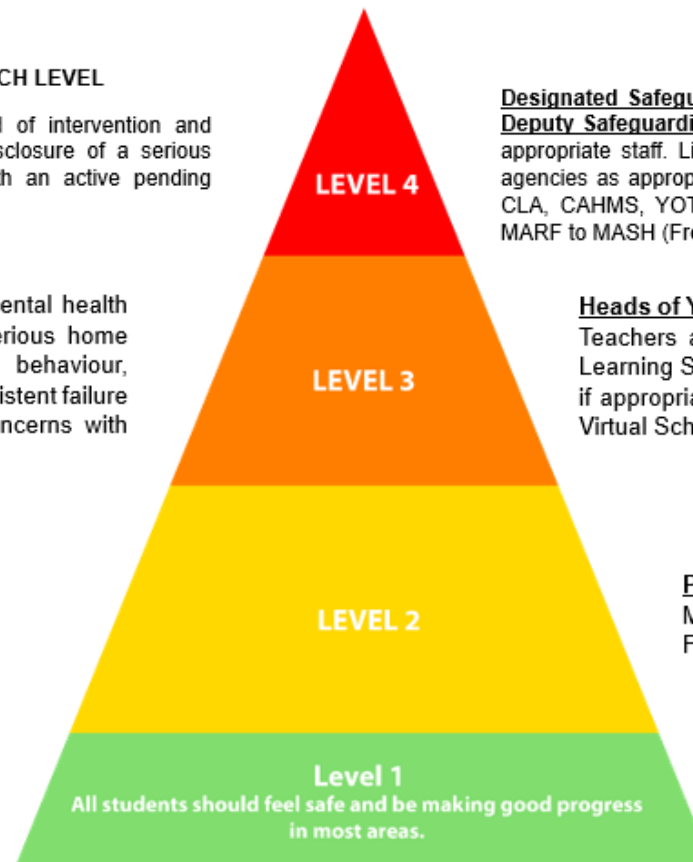
### **Responsibilities for Support and Intervention**

#### **EXAMPLES OF CONDITIONS/CONCERNS AT EACH LEVEL**

At serious risk of harm and in immediate need of intervention and protection: suicidal ideation, missing students, disclosure of a serious nature (e.g. abuse/extremist views), students with an active pending criminal case, at risk of being NEET.

Complex support needs: serious depression/mental health concerns (i.e. under GP care or CAHMS), serious home circumstances, exhibits dysfunctional behaviour, homelessness, habitual irregular self-harm, persistent failure to meet deadlines in all subjects, multiple concerns with regards to progress.

Anxiety, stress, low mood (managing with limited intervention) difficult home circumstances, attendance/progression issues, low level behavioural concerns, course changes, study skills support.



#### **WHO IS RESPONSIBLE?**

Designated Safeguarding Lead (GJW) / Safeguarding Officer (HAS) / Deputy Safeguarding Leads (SJP, JDF, EFC, MLC) in collaboration with appropriate staff. Liaise with Counsellor, MH & W Mentor, and external agencies as appropriate, which may include Early Help, Social Services, CLA, CAHMS, YOT, Police, Health Professionals. This may result in a MARF to MASH (Front Door).

Heads of Year in collaboration with DSL/DDSLs, Pastoral Tutors, Teachers and HoDs. Liaise with Counsellor, MH & W Mentor, Learning Support, and professional external agency involvement if appropriate, which may include e.g. Early Help, CAHMS, and Virtual School.

Pastoral Tutors / Teachers in liaison with MH & W Mentor, Counsellor, Learning Support, Careers, Student Finance/Transport, with some external support e.g. GP.

## 2. Promoting the wellbeing of students

The College takes seriously its responsibility to deliver this outcome and responsibility for it is spread between departments and cross College areas. On the whole, the details are held within a range of other, referenced, policies.

The College shall:

- Provide a safe and inclusive environment.
- Teach students about wellbeing and develop awareness and skills in being safe and staying safe.
- Have staff who are proactive in this promotion.
- Tell students what support is available to them and how to access it.

In order to do this:

- Procedures for dealing with volunteers and visitors are centred on safeguarding requirements. (Appendix 13)
- The College will seek to ensure that Equality\* is ensured (in line with policies listed on page 20).
- The College's Health and Safety, Offsite\* and Work Placement\* procedures and arrangements meet safeguarding requirements.
- There is an Anti-Bullying Policy and incidents are logged and monitored closely.
- Students have induction sessions and other provision focusing on wellbeing via curriculum areas, the tutorial programme, events and Student Services. All are given 'Stay Safe' Z cards. Safeguarding team posters are visible in tutorial rooms and around College.
- Safeguarding messages and information focus on positive wellbeing as well as raising awareness of unsafe, unwise and illegal behaviour.
- Students are made aware of e-Safety via the Acceptable Use Policy\* and work led by the ILT team. In addition, activities and guidance are given via tutorial and also in Department areas, especially where certain provision raises particular issues.
- The College support services, systems and networks are highly visible.
- Quality Assurance\* procedures such as lesson/tutorial observations, questionnaires, surveys and self-assessment monitor how we teach students to stay safe.
- Consent is always sought for photographing students as part of the learning agreement.
- Risk assessments are drawn up when a student has disclosed evidence of a criminal conviction or when a student has been perceived to be a potential threat to another student.
- The College alerts students and staff to the dangers of extremist ideas and will train staff in the procedures of the Prevent strategy. (Appendix 4)
- Within our local area, statistics taken in May 2025, show that violence/sexual offences, antisocial behaviour and theft (other) are the three highest crimes committed. This is checked regularly by the DSL and is a particular focus through the pastoral team and wider tutorial programme. *Data taken from <https://www.crime-statistics.co.uk>*

### Online Safety and protecting students (see also e-safety policy)

It is essential that young people are safeguarded from potentially harmful and inappropriate online material. An effective whole College approach to online safety empowers us to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. All staff are aware that abuse can take place solely online.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, it should be reported to the [Anti-Phishing Working Group APWG](#)

Considering the 4Cs (above) will provide the basis of an effective online policy. The College has a clear policy on the use of mobile and smart technology, which will also reflect the fact many students have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some students, whilst at College, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

As an education setting, the College is directly responsible for ensuring that an appropriate level of security protection procedures is in place in order to safeguard College systems, staff and students and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the [National Education Network](#). In addition, the College will meet the [Cyber security standards for schools and colleges.GOV.UK](#). Broader guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

Worcester Sixth Form College will be doing all we reasonably can to limit students' exposure to risks from the College's IT system

- We ensure that students are safeguarded from potentially harmful and inappropriate online material by using the software 'Smoothwall' which monitors all online activity on college machines. We have an effective whole college approach to online safety which empowers us to protect and educate, students and our staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate (see also e-safety policy)

- We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures including how online safety is reflected in other relevant policies. We consider online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and engaging with parents to raise an awareness in order to support their children
- Education at home – where students are asked to learn online at home the department has provided advice to support colleges and colleges do so safely: [safeguarding-in-colleges-colleges-and-other-providers and safeguarding-and-remote-education](#). Also info at [NSPCC](#)

## Safeguarding in the curriculum

- Safeguarding messages and information delivered through induction, tutorials, and e-mails/bulletins focus on positive wellbeing as well as raising awareness of unsafe, unwise and illegal behaviour.
- Students have induction sessions and other provision focusing on wellbeing via curriculum areas, the tutorial programme, events and Student Services. All are given 'Stay Safe' Z cards. Examples of tutorial sessions which can be seen in the tutorial programme scheme of work are;
  - Bullying/Cyber Bullying
  - Sexual Violence and Harassment and respect
  - Healthy relationships and consent
  - Drugs, Alcohol and Substance Abuse
  - Online Safety / Mobile technologies
  - Fire and Water Safety
  - Child on Child abuse
  - Road Safety with the local Road Safety Partnership Team
  - Domestic Abuse, Healthy Relationships, Consent and Sexual Exploitation of Children (CSE)
  - Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)
  - Criminal Exploitation (County Lines)
  - Child Exploitation of Children
  - Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Colleges (2014)<sup>1</sup>.

We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such young people, College may be one of the few stable, secure and predictable components of their lives. Others may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The College recognises that additional barriers can exist when recognising abuse and neglect in this group of students.

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<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Colleges.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Colleges.pdf)

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in College or the consequences of doing so.

Any reports of abuse involving students with SEND will require liaison with the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) and the Learning Support Manager (also DDSL).

The College will consider extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place.

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of young people with SEND. [Worcestershire \(councilfordisabledchildren.org.uk\)](http://Worcestershire.councilfordisabledchildren.org.uk)
- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning and](#)
- [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)

### **3. Students *in need***

**The College recognises that some students will have additional *needs* and/or characteristics which deem them *vulnerable*. For such students the College may take additional action to promote their welfare and/or to reduce barriers to them reaching their potential.**

The College shall:

- Identify such students.
- Discuss barriers to success with students.

- Make appropriate support available.
- Monitor student's progress and outcomes.

In order to do this:

- Staff are introduced to the key terms (Appendix 2) via training.
- Such students are identified at interview and noted. Information is actively sought from partners to inform our response.
- Information held about students who need careful monitoring is updated regularly, usually once per half term.
- The attendance of students who need careful monitoring is checked using a system that alerts the pastoral tutors if a student in this category is absent.
- All staff are able to identify emerging issues of vulnerability.
- The pastoral team monitors all students closely.
- There is a Learning Support team that specialises in supporting students within College who have specific needs.
- Student Services provide support through Counselling Policy
- Specific arrangements are in place to support the needs of Young Adult Carers.
- Staff work closely with Parents and Partner agencies, through Worcestershire Family Front Door and Community Social Workers, where appropriate.
- There is a nominated Children Looked After *Co-ordinator* (Heather Anderson-Stevens) who supports and monitors this particular vulnerable group and students who have previously been *Looked After*.
- Quality Assurance processes consider outcomes for this group of students.

#### **4. Students in need of *protection***

Where there is a concern that a student may be suffering, or at risk of suffering, significant harm from abuse, there are specific procedures to follow. The significance of such cases for those involved is understood by the College and explains the importance placed on this section of the Safeguarding Policy.

The College shall:

- Ask all members of the College community to be vigilant as regards abuse.
- Ensure procedures meet external requirements, are clear and are followed by staff.
- Deal with cases appropriately and professionally.
- Offer appropriate supervision/support to staff involved in cases.
- Value Inter/multi agency working.
- Adopt an ethos of review.

In order to do this:

- Students have an induction session on safeguarding and further sessions via the tutorial programme. All staff undertake induction and training to ensure they understand:
  - the extent of the term *abuse* (e.g. inc. Child Sexual Exploitation (Appendix 5b), forced marriage (Appendix 5g) and female genital mutilation FGM (Appendix 5i), Modern Slavery (Appendix 5k)

- the notion of *significant harm* (Appendix 2)
- they are well placed to spot likely **sign and indicators** (Appendices 3 and 4)
- College **procedures** to follow as *outlined in the following flow diagrams*
- that dealing appropriately with **confidentiality** is vital in cases of protection and so
  - they cannot promise to keep what students tell them a secret
  - they only discuss protection concerns with the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence)
  - the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) will only pass on information internally on a need to know basis
  - we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the student
- The nature of the Prevent Duty and the responsibility of all staff to be alert for students who are at risk of radicalisation (Appendix 4)
- Safeguarding responses are put in place in cases where students go missing from education and parents are alerted to absences via parent portal and/or other methods such as phone or e-mail
- Students who make a disclosure are **listened to** as *outlined in the flowchart / guidance* on page which staff receive in training.

## LGBTQI+

Some students may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, biphobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide, or homelessness.

Several studies also evidence that LGBTQI+ young people may be at increased risk of becoming victims of CSE.

The College is aware of these increased risk factors and knows how to access appropriate support for these young people when required.

## Raising Complaints and Concerns

We respond robustly when concerns are raised or complaints made (from students, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. The College will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The College's complaints procedures are available on the College website or on request.

## 5. Procedures for Managing Concerns

WSFC adheres to child protection procedures that have been agreed locally through the Safeguarding Worcestershire [www.safeguardingworcestershire.org.uk/](http://www.safeguardingworcestershire.org.uk/) Where we identify students in need of support, we will carry out our responsibilities in accordance with the West Mercia Consortium inter-agency procedures and the WSCP Levels of Need Guidance.

## **Reporting a safeguarding concern**

**The Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) is the first point of contact for concerns and queries regarding any safeguarding concern about a student in College.** Any member of staff or visitor to the College who receives a disclosure of abuse or suspects that a student is at risk of harm must report it immediately to the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence). Ideally the staff member should take the student with them to see the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence). If the student is not with them, they can also alert the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) by completing a safeguarding concern in the concern tab on the student's portal page. This concern is sent directly to the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence).

**All concerns about a student should be reported without delay.** Any notes of a disclosure can be recorded on the staff portal, under the students names. The Safeguarding Officer (or DSL/Deputy in their absence) will consider what action to take and have appropriate discussions with parents/carers as appropriate prior to referral to children's social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation. All safeguarding concerns are recorded by the Safeguarding Officer (or DSL/Deputy DSL in their absence) in a confidential safeguarding interview note.

All referrals will be made in line with local procedures as detailed on the Worcestershire website.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) /or the Principal. Concerns should always lead to help for the child at some point.

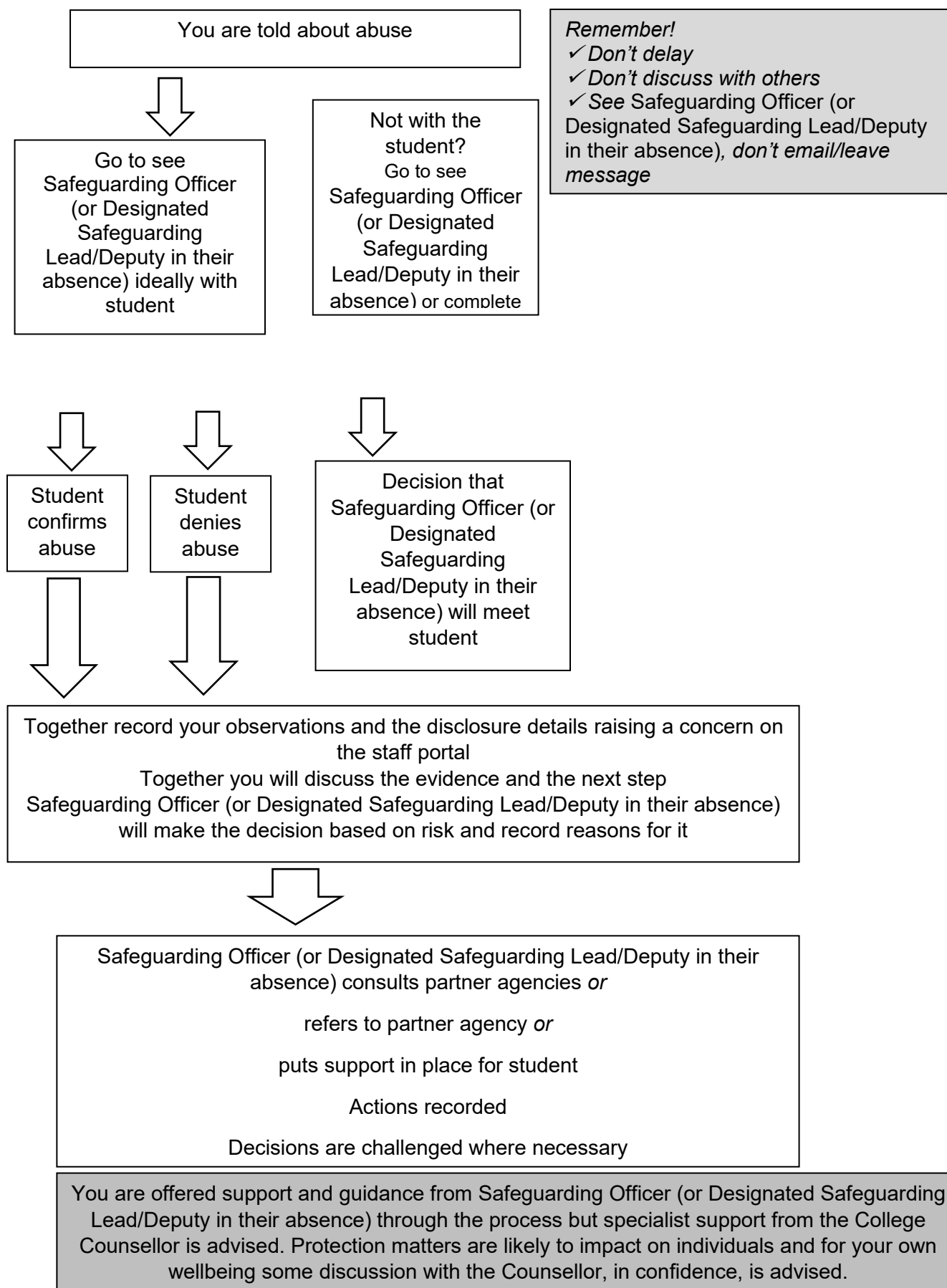
Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

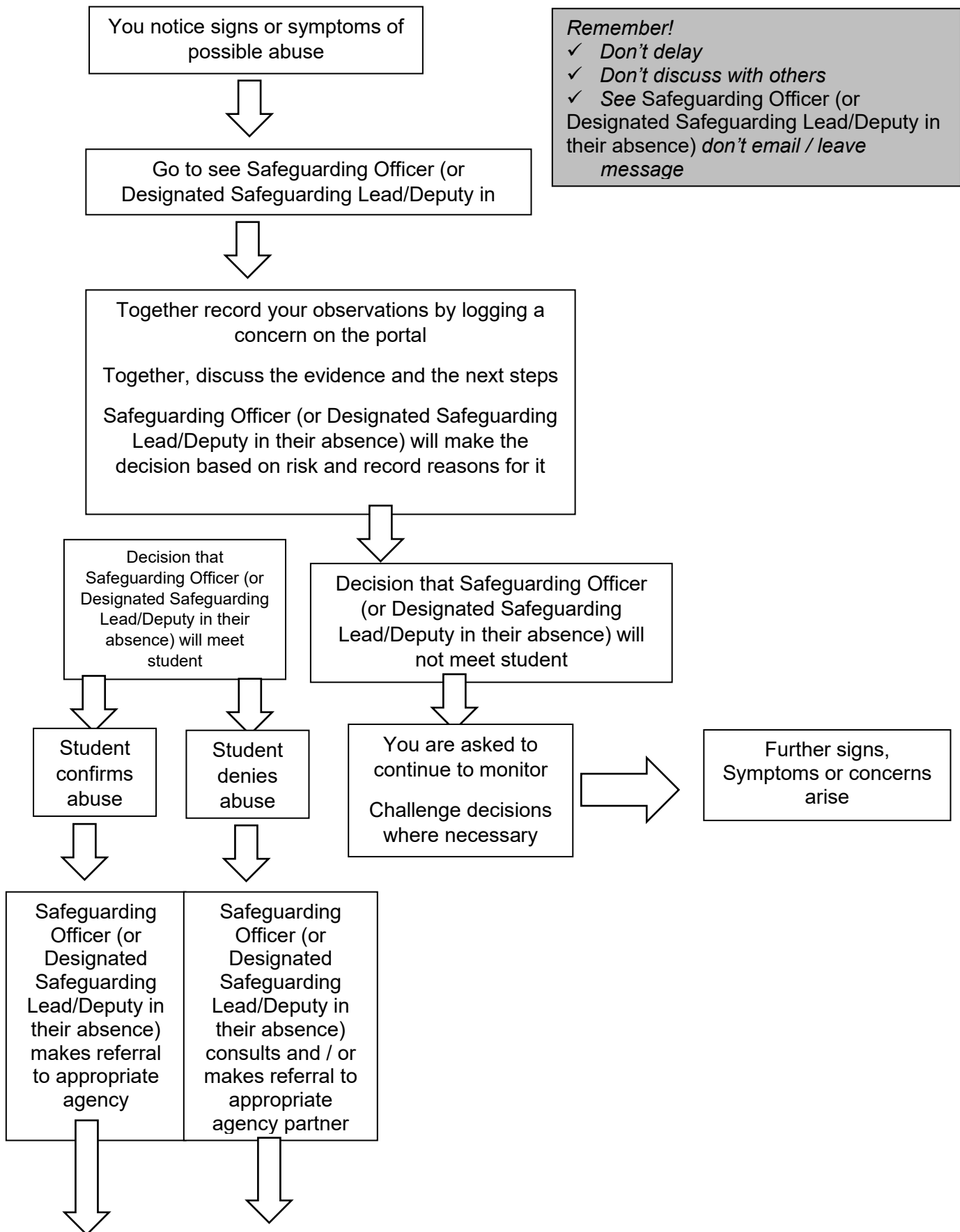
- the situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff who does not feel that concerns about a student have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

NSPCC's <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) **NSPCC - When to call the police**

## Safeguarding – Protection Procedure Disclose of Abuse





You are offered support and guidance from Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) through the process but specialist support from the College Counsellor is advised. Protection matters are likely to impact on individuals and for your own

## Listening to Disclosures of Abuse

- ✓ react calmly
- ✓ be aware of your non-verbal messages
- ✓ keep responses short, simple, quiet
- ✓ don't stop the student who is freely recalling significant events
- ✓ don't interrogate – observe and listen
- ✓ avoid comment on the alleged perpetrator
- ✓ never offer absolute confidentiality; advise at an early stage that information that a student may be at risk, may require that you must speak to someone else in College and reassure them that only those that need to know would be told
- ✓ reassure them that they can be involved in such a discussion and they are doing the right thing
- ✓ don't end the conversation abruptly, tell the student what will happen next
- ✓ do not discuss the case with other staff
- ✓ make a written note using the concern log on the portal (kept in offices and in main reception) of what was said and what you observed, sign and date and give this to the Designated Safeguarding Lead
- ✓ **Follow procedures** – see preceding flow chart

**Your role is to listen and refer on as the law requires**

**Your role is not to judge, rescue, interrogate, give advice**

- Staff receive a briefing to remind them of definitions and procedures
- As issues surrounding protection are often challenging and hard to predict and procedures outlined above may not always exactly match reality, all staff are trained **that if they are in doubt they should consult**. Staff should consult the Designated Safeguarding Lead and the Designated Safeguarding Lead in turn should consult the Community Social Workers / Staff at Family Front Door or other partner agencies for

advice. However in urgent situations, any member of staff can refer their concerns to Children's social Care (Family Front Door) directly.

- **The age of a student** should not change the initial internal referral of concerns to the Designated Safeguarding Lead. It may inform discussion and actions from that point on and the Adult Safeguarding Board Protocols should be considered where appropriate.
- The principle that no-one should deal with a protection concern in isolation is fundamental.
- Any protection concerns shall be recorded as a confidential Safeguarding interview note and all documentation saved in the student's confidential documents tab on their portal page.
- A Safeguarding Team (*See Roles and Responsibilities earlier in policy*) will have specific training in line with Guidance in *Working Together to Safeguard Children 2018* and *Keeping Children Safe in Education September 2025* to jointly manage cases.
- The Safeguarding Team meets fortnightly to review cases, agree actions and update records.
- The Safeguarding Team also consider lessons learnt, and this informs practice. The minutes of these meetings go to SLT.
- The Principal, the Vice Principal, members of the Safeguarding team, tutors and the College Counsellors have access to memos, assessments and Safeguarding records.
- Safeguarding case files are held securely in paper form until the student reaches their 25<sup>th</sup> birthday. All members of the Senior Leadership Team are aware of the location and access of protection case files.
- The Safeguarding Officer (or Designated Safeguarding Lead/Deputy in their absence) arranges for the secure and timely transfer of case files to other institutions where appropriate when a student leaves the College in accordance with Worcestershire Safeguarding Children Partnership Guidelines. Where possible this is done electronically.
- Staff involved in a protection concern or case, are offered advice and guidance from the Designated Safeguarding lead and other members of the Safeguarding team.
- The Counsellors have external supervision and supervision is offered to all members of the Safeguarding team. Supervision for all staff is made available through the College's Employee Assistance Programme.
- Inter/multi agency working protocols are followed and the professional responsibility to co-operate with other agencies is upheld as is the notion that professional challenge is considered good practice.
- Designated Staff attend sharing of good practice meetings with other colleges, the WSCP and seek to develop their skills and experiences beyond minimum requirements.

- Lessons learnt from Serious Case Reviews and other Government and Safeguarding Board reviews are disseminated to all staff.

## Managing Professional Disagreements

On occasions there will be disagreements between professionals as to how concerns are handled and these can impact on effective working relationships. The College will support staff to promote positive partnerships within college and with other agencies and will ensure that **staff** are aware of how to escalate concerns and disagreements if appropriate and use the WSCP escalation procedures if necessary.

<http://westmidlands.procedures.org.uk/local-content/4gjN/escalation-policy-resolution-of-professional-disagreements>

## 6. The use of 'reasonable force' in colleges

There are circumstances when it is appropriate for staff in College to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Key staff members have received training in restraint and reasonable force and any such incidents are logged.

Advice for colleges is available on the AOC website. <https://www.aoc.co.uk/>

## 7. Staff Recruitment and Training

The College recognises it has a duty to ensure the safe recruitment of staff and volunteers and as such HR systems need to be robust. Training is seen as a fundamental process in informing and ensuring safeguarding duties are met and WSCB pathways and guidance about groups in *Working Together to Safeguard Children* and *Keeping Children Safe in Education* 2025 inform the training plan.

The College shall:

- Work within the legislative framework. The Policy on Recruitment and Selection\* outlines procedures and those Policies and procedures that deter, reject or identify anyone who may be unsuitable to work or be in the College for safeguarding reasons.
- Make clear its commitment to safeguarding to prospective employees.
- Ensure that all staff have completed appropriate training

- Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who do not already have one.
- Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.
- We carry out a Section 128 check for governors, because a person subject to one is disqualified from being a governor. Using the link below, we can easily check if a person we propose to recruit as a governor is barred as a result of being subject to a Section 128 direction.

<https://www.gov.uk/government/collections/individuals-prohibited-from-managing-or-governing-schools>

- In the case of Heart of Mercia Academy Trust, the Trust requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the Chair of the board of charity trustees. The Trust must also check that members are not barred from taking part in the management of the College as a result of a section 128 direction

In order to meet its duty:

- Checks on all adults working in the College are carried out in line with *Safeguarding Children and Safer Recruitment in Education and Keeping Children Safe in Education 2025* and records are completed and held on a Single Central Record to monitor and demonstrate compliance. Risk assessments are carried out where needed. References are sought and gaps in employment and / or training are checked.
- Job descriptions and other recruitment materials carry a safeguarding statement and interviews are carried out by at least one member of staff who has completed Safeguarding in Recruitment training and assessment. Interview questions always include safeguarding questions.
- As part of the shortlisting process we conduct an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.
- All adults working in and visiting the College wear lanyards and badges: blue *staff* lanyards are worn by all staff with orange lanyards for Governors. Visitors wear red lanyards although those visitors who are regular volunteers or frequent visitors, who have completed the necessary safeguarding checks, wear green lanyards. Visitors and occasional volunteers are supervised. Regular volunteers and frequent Visitors are given a briefing document (Appendix 8) and all visitors receive a copy of the safeguarding Advice for Visitors (Appendix 8A).
- HR update training records for any course linked to safeguarding that staff attend and any certificates received are placed on their HR file. Training reports go to SLT.
- Safeguarding training forms part of the Induction of all new staff.
- Education Visit Leadership training is compulsory for all members of staff who wish to organise a College trip. Training has to be refreshed at least every five years.
- All staff will be trained in the principles of PREVENT and of indicators of Vulnerability to Radicalisation.
- Whole staff training Safeguarding Training will be refreshed at least every 3 years with regular updates at least annually.
- Training will include signs and symptoms of abuse and neglect, as well as specific safeguarding issues, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (County Lines), Female Genital Mutilation (FGM), Prevent, on-line safety and peer on peer abuse, including sexting and sexual violence and sexual

harassment. Training will also include how to record and report abuse both within College and to Children's Social Care.

We will record all information on the checks carried out in the College's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' HR files. We follow requirements and best practice in retaining copies of these checks, as set out below.

The SCR will be monitored and checked by the DSL/HR/Safeguarding Governor on a regular basis, throughout the academic year.

### **Appointing new staff**

When appointing new staff, we will:

- Verify their identity (latest version of KSCIE - Best practice is checking the name on their birth certificate)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information (all WSFC staff will be engaging in regulated activity).
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 6 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Secretary of State section 128 direction A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent college, including academies and free colleges. An individual who is subject to a section 128 direction is unable to:
  - take up a management position in an independent college, academy, or in a free college as an employee.
  - be a trustee of an academy or free college trust; a governor or member of a proprietor body of an independent college; or
  - be a governor on any governing body in an independent college, academy or free college that retains or has been delegated any management responsibilities.
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (August 2018).
- In addition, as part of our shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the College might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. (Refer to latest version of KCSIE Part 2 – Legislation and the Law for information on data protection and UK GDPR).

We will seek references on short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a college or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a college or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

All staff in College are in regulated activity.

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. The College will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The College believes the individual has engaged in relevant conduct <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children> ; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 <https://www.legislation.gov.uk/uksi/2009/37/made>; or
- The 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the college has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors and record that we have done so.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the College.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

### **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in colleges or colleges (set out in paragraphs 213). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, colleges and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

### **Governance**

All governors will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.

All local governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the **Education and Skills Act 2008**;
- Identity;
- Right to work in the UK;
- Other checks deemed necessary if they have lived or worked outside the UK.

## **8. Staff Conduct**

**The College recognises that the conduct of staff and other adults creates the ethos of the College and that it has a duty of care towards staff. The College also recognises that it is possible that a member of staff or volunteer may behave, or be accused of behaving, in a manner which would harm a student.**

The College shall:

- Inform staff about what constitutes appropriate conduct.
- Inform staff of procedures for the management of allegations against staff.
- Deal with allegations against staff as a serious matter for all parties.
- Aim to protect those who raise concerns.

In order to do this:

- The Trust Code of Conduct for Staff states expectations and guides staff about positive conduct.
- The Code also deals with the law and the *position of trust* as does staff training.
- The College also issues additional Guidance on Safer Working Practices including advice about illegal, unsafe and unwise conduct. This also notes safe practice as regards electronic communication. (*Appendix 12*).
- Procedures for dealing with allegations against a member of staff are outlined in our Managing Allegations policy which is available upon request from the PA to the Principal. This policy follows guidance from the WSCP and WCC.
- A Trust policy on Whistle blowing is known to staff and is available on our website.

## **9. Contextual safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between young people outside of these environments. Consequently, all staff will be made aware of specific issues relating to locality that could impact on the safety of children. We will ensure all staff receive regular safeguarding briefings to keep them up to date and have the opportunity to share community issues that may impact our children.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## **10. Children Missing from Education**

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. It is important the College's response to students missing from education supports identifying such abuse and also helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where students are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a child looked after), where going missing from education may increase known safeguarding risks within the family or in the community.

Registers are taken in each lesson and pastoral tutors follow up absences with parents/guardians. Any further concerns are passed on to the relevant Head of year, all of whom are part of the safeguarding team. Students that need careful monitoring have an attendance alert which alerts the relevant pastoral tutor by e-mail if a student is marked absent from a lesson.

## **11. Other related policies under the broad remit of safeguarding**

The following Policies and Procedures have been mentioned in this Safeguarding Policy or in its appendices

- Child on Child abuse
- E-Safety Policy
- Acceptable Use Policy

- Anti-Bullying Policy
- Code of Conduct for Staff
- Complaints Policy
- Whistleblowing Policy
- Equality Policy
- Freedom of Speech Policy
- Counselling Policy
- Health and Safety Policy
- Learning Support Policy
- Managing Allegations
- Outdoor Offsite Policy
- Quality Assurance Policy
- Recruitment and Selection Policy
- Staff Development Policy
- Student Conduct policy
- Worcestershire 14-19 Partnership Board Learning Provider Safeguarding Guidance
- Work Placement Policy

The following Policies also have particular relevance:

- Digital Strategy Policy
- Fire Safety Policy
- Children on Site Policy
- Guide for Students and Parents

## **12. Monitoring & reviewing of the safeguarding policy**

The Safeguarding Policy is monitored throughout College by:

- Governors through an annual report usually in the summer term to both the Curriculum & Quality Committee and the Finance & Resources Committee.
- Governors through an annual review of the Safeguarding Policy.
- SLT via a standing item at all SLT Meetings.
- SLT through regular training reports.
- SLT through on-going, annual Quality Assurance processes.
- The Protection Team through their regular meetings and reviews.
- Heads of Departments via the self-assessment process.
- Students through questionnaires and Student Voice activities.

### **Review**

- The Safeguarding Policy is reviewed annually by the Designated Safeguarding Lead in conjunction with the Principal and in consultation with the HR Officer.
- Others with particular roles as outlined in the Policy will be consulted on their area of responsibility.
- Students may be consulted on elements of the policy as part of the review.
- Amendments and changes will be agreed firstly by SLT and then referred to the Local Governing Body

## **Outline of Sources of Statutory Duty, Non- Statutory Guidance and Protocols**

### **The Children Act 1989**

Section 17 - safeguard and promote welfare  
SECTION 47 – TO MAKE ENQUIRIES  
Section 44 – emergency protection order  
Section 46 – Police Powers, remove/reasonable steps  
Sharing information

### **United Nations Convention on the Rights of the Child 1989**

### **The Human Rights Act 1998**

### **The Education Act 2002**

Section 175 – Designated staff, policy, training  
Guidance in Safeguarding Children in Education  
Duty to safeguard and promote welfare

### **Sexual Offences Act 2003**

Abuse of position of trust, up to 18 yrs, whatever views held

### **The Children Act 2004**

Followed Every Child Matters Green Paper  
Local Safeguarding Boards and Children's Trusts  
Duty to co-operate

### **Working Together to Safeguard Children (2006), (2015), (2018), (2023)**

2003 version response to Climbié Inquiry  
Provides definitions of abuse  
Inter-agency working and serious case reviews  
2010 reflect Laming's Progress Report 08 and Govt Action Plan 09

### **Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012**

Response to Bichard Inquiry  
Safeguarding Children and Safer Recruitment in Education (2006)

### **What to do if you are worried a child is being abused: advice for practitioners (2015)**

### **Information Sharing: Practitioners' Guide (2015)**

### **Evidence on the Retention and Transfer of Child Protection Records for all Educational Establishments in Worcestershire 2015**

### **Extremism and Radicalisation: Prevent – Information for Colleges and Colleges 2015**

### **The Counter-Terrorism and Security Act 2015 – places a duty on colleges and colleges to safeguard their students from being drawn into terrorism**

**Sexual violence and sexual harassment between children in colleges and Colleges (2018)**

**Keeping Children Safe in Education (September 2025)**

**Local Guidance**

**Multi Agency Levels of Need Guidance May 2019 (formerly Thresholds Guidance)**

**Child Sexual Exploitation (CSE) Pathway 2016**

## Definitions of Key Terms

### Safeguarding

- Safeguarding and promoting the welfare of children (including anyone under the age of 18) emphasising the prominence of exploitation, adultification, and teenage relationship abuse.
- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Enabling children to have optimum life chances in adulthood

### A child

is anyone who has not yet reached their 18<sup>th</sup> birthday

### Vulnerable adults

18+ and receiving health care or other regulated activity which falls within the definition ie provision of personal care or social work, assistance with cash, bills and/or shopping, assistance in the conduct of a person's own affairs or being conveyed because of their age, illness or disability to or from their place of residence and a place to receive health, personal or social care.

### In need

Children who are referred to as "in need" under section 17 of the Children Act (1989) are those

- whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development,
- or their health and development will be significantly impaired without the provision of services

### Young Carers

are children and young people who assume important caring responsibilities for parents or siblings, who are disabled, have physical or mental health problems or misuses drugs or alcohol.

### Protection

Activity taken to protect specific person suffering or likely to suffer significant harm.

### Harm

- ill-treatment (including sexual abuse and physical abuse)
- impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child (Children Act 1989 section 31(9))
- The impairment of a child's health or development as a result of witnessing the ill-treatment of another person (Amended by the Adoption and Children Act 2002.)

### Significant harm

The Children Act 1989 introduced this concept as

- the threshold that justifies compulsory intervention in family life in the best interests of children
- and places a duty of care on Local Authorities to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm
- factors include - degree, extent, duration, frequency, degree of premeditation, presence of coercion, sadism

### **Physical Abuse**

- 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.

### **Sexual Abuse**

- involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening
- activities may involve physical contact, including penetrative (e.g. Rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

### **Neglect as Abuse**

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.

- may occur during pregnancy as a result of maternal substance abuse.

### **Forced marriage**

is an abuse of Human Rights and a protection issue (see Appendix 5g)

### **Female Genital Mutilation (FGM)**

is an abuse of Human Rights and a protection issue (see Appendix 5i)

## RECOGNITION & IDENTIFICATION OF ABUSE

*Taken from Working Together to Safeguard Children 2023, Appendix A*

### What is abuse?

Abuse and neglect are forms 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 another child or children.

### Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

### 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, 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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, though it may occur alone.

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression

- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- Child may be underweight and/or stunted
- Child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

## **NEGLECT**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular College attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs
- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.<sup>2</sup>

## **Common Concerns:**

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment
- Cleanliness
- Health
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

Poor health, including mental health or mental illness, disability, including learning difficulties, substance misuse and addiction, domestic violence

College staff need to consider both acts of *commission* (where a parent/carer deliberately neglects the child) and acts of *omission* (where a parent's failure to act is causing the neglect). This is a key consideration with regard to college attendance where parents are not ensuring their child attend College regularly.

Many of the signs of neglect are visible. However College staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

### **Physical signs:**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

### **Behavioural signs:**

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from College for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at College (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

## PHYSICAL ABUSE

Physical abuse 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.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

### Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
  - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
  - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
  - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
  - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
  - Bite marks may be evident from an impression of teeth
  - Small circular burns on the skin suggest cigarette burns
  - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
  - Red lines occur with ligature injuries
  - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby
  - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.

- Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
- Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

### **Behavioural signs:**

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

### **SEXUAL ABUSE**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not 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 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.

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in College or through other activities.

### **Characteristics of child sexual abuse:**

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their

motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

### **In older children behavioural changes may include:**

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend College or start to have difficulty concentrating so that their Collegework is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

### **Physical signs and symptoms for any age child could be:**

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

### **Sexual Abuse by Young People**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about

a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

## **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society’s standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

<sup>1</sup> Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

## PREVENT STRATEGY

### Introduction

Worcester Sixth Form College is committed to providing a secure environment for students, where learners feel safe and are kept safe. Our designated lead for the Prevent strategy is Graham Williams, in his role as the DSL. All adults at Worcester Sixth Form College recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

The prevention of extremism and radicalisation is one element within our overall College arrangements for Safeguarding. It is drawn up in accordance with the Counter-Terrorism and Security Act of February 2015, and draws upon the guidance contained in "Prevent: Resources Guide", "Tackling Extremism in the UK", DfE's "Teaching Approaches that help Build Resilience to Extremism among Young People".

### Preventing radicalisation

Children and young people are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting them from this risk should be a part of a College's 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.

As defined in the Government's Counter Extremism Strategy,  
[www.gov.uk/government/publications/counter-extremism-strategy](http://www.gov.uk/government/publications/counter-extremism-strategy)

As defined in the Revised Prevent Duty Guidance for England and Wales,  
[www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales](http://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales)

As defined in the Terrorism Act 2000 (TACT 2000)  
[www.legislation.gov.uk/ukpga/2000/11/contents](http://www.legislation.gov.uk/ukpga/2000/11/contents)

There is no single way of identifying whether a young person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to their 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 a student's 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 (or deputy) making a Prevent referral.

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

## **The Prevent duty**

All colleges 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 duty is known as the Prevent duty.

The Prevent duty is part of College's wider safeguarding obligations. Designated safeguarding leads and other senior leaders are familiar with the revised [Prevent duty guidance: for England and Wales](#) and have all received Home Office Prevent training. There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

## **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 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](#).

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 teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help 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](#).

## College Ethos and Practice

When operating this policy Worcester Sixth Form College uses the following accepted Governmental definition of extremism which is:

*‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.*

There is no place for extremist views of any kind in Worcester Sixth Form College. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. We promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage learners to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is our most fundamental responsibility to keep our learners safe and prepare them for life in modern multi-cultural Britain and globally.

In order to implement our ethos, the College shall

- Provide a broad and balanced tutorial programme that includes the study of Fundamental British Values, the Prevent Strategy and how students can keep themselves safe on-line
- Seek and identify opportunities in schemes of work for the promotion of Fundamental British Values, within teaching programmes, also.
- Block and monitor attempted access to inappropriate internet sites and other strategies as outlined in the College’s e-Safety policy
- Require any external speakers to sign the External Speaker Declaration and the supervising member of staff will complete a risk assessment for their visit
- Require any external organisation wishing to book the premises to complete a Premises Booking Form that indicates their support for Fundamental British Values (as in Freedom of Speech policy)
- Require permission to be sought for fundraising activities within College
- Ensure that the College Prayer and Contemplation room is for use by individuals only (from all faiths or none) and not groups. Its use will be monitored.
- Provide training for staff in how to promote freedom of speech through debate and discussion, whilst also handling the debate with sensitivity and without causing offence
- Consult with groups of students on how to promote a cohesive College society
- Train all members of staff and governors on the Prevent strategy and on what to do if they witness extremist views being expressed in College

- Train all members of staff to challenge any prejudice or discrimination, including derogatory language, displayed by learners or staff and to deal with it in line with the Student Code of Conduct and the Staff Code of Conduct
- Work with outside agencies and community groups to enhance the College's awareness of local issues and to assist in the broadening of our students' experiences and horizons

## **Monitoring Risk and Raising Concerns**

The College will carry out an annual risk assessment based on information provided by our Channel Panel contacts and this will be reviewed at least termly by the College's Designated Safeguarding Lead (who is also the Single Point of Contact for Prevent) and can be contacted on [graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk). Within College, where there are concerns of extremism or radicalisation, learners and staff will be encouraged to make use of our internal Safeguarding procedures to report their concerns to the DSL or any member of the Safeguarding Team or Senior Leadership Team. The team will then discuss the case with the College's Channel/Prevent contacts with a view to referring the case to the Channel Panel.

**5(a) 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 College can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. Any such concerns should be passed immediately to the DSL or one of the Deputy DSLs.

Through the tutorial programme we will give practical advice to students on how to keep themselves safe. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**5 (b) Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

Different forms of harm can 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.

**Child criminal exploitation** is increasingly used to describe this type of exploitation where children are involved, and is defined as:

*‘Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.’*

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

The sexual exploitation of children and young people (CSE) under-18 is defined as that which: *‘involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.’*

Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.’ (Department for Education, 2012) Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

**Who is at risk?**

Child criminal or sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young

men are also victims of this type of abuse. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people. In all its forms, CSE is child abuse and should be treated as a child protection issue.

## **WARNING SIGNS AND VULNERABILITIES CHECKLIST**

The evidence available points to several factors that can increase a child's vulnerability to being criminally or sexually exploited. The following are typical **vulnerabilities in children prior to abuse**:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse and neglect)
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships (in cases of gang-associated CSE only)
- Attending College with young people who are sexually exploited
- Learning disabilities
- Unsure about sexual orientation or unable to disclose sexual orientation to families
- Friends with young people who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

The following can be indicators or 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 wellbeing
- misuse alcohol or other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss College or do not participate in education.

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation. The DSL is the dedicated lead person with responsibility for implementing local guidance in respect of child sexual exploitation. The DSL is aware of the guidance on Child Sexual Exploitation on the WSCB website: <http://www.worcestershire.gov.uk/cms/safeguarding-our-children/child-sexual-exploitation.aspx>

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. The DSL will follow the Worcestershire Pathway for dealing with issues of CSE, including completion of the screening tool.

### **5(c) County Lines**

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

The UK Government defines county lines as:

*'a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.'*

#### Crimes Associated with County Lines

**Drugs** - County lines commonly involves the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

**Violence** - Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

**Exploitation** - Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

**Sexual Exploitation** - Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

#### Signs to look out for

A young person's involvement in county lines activity often leaves signs. A person might exhibit specific indicators where they are being criminally exploited through involvement in county lines, these might include:

- going missing and subsequently found in areas away from their home
- being the victim or perpetrator of serious violence e.g. knife crime
- receiving requests for drugs via a phone line, moving drugs, handling over and collecting money for drugs
- being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- being found in accommodation that they have no connection with or hotel room where there is drug activity
- Owing a 'debt bond' to their exploiters
- Having bank accounts used to facilitate drug dealing.

### Terms associated with County Lines

Here are some words/terms that are commonly used when describing county lines activity. someone using these words might be involved in or might know of County Lines activity.

*Cuckooing* - when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs. Signs of cuckooing:

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

*Going Country*- this is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

*Trapping* - the act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

*Trap House* - A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

*Trap line* - This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

### What to do if you have concerns a young person is involved in County Lines

Follow the normal safeguarding procedures and refer to the College's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance of the West Midlands Child Protection Procedures.<sup>3</sup> Further guidance is available in the Home Office's publication 'County Lines: criminal exploitation of children and vulnerable adults'.<sup>4</sup>

## **5 (d) Children Looked After and Previously Children Looked After**

The most common reason for children becoming looked after is because of abuse and/or neglect. Governing bodies and proprietors will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

In particular, we ensure that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the student's contact arrangements with birth parents or those with parental responsibility. We also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead and the Learning Support Manager will have details of the child's social worker and the name of the virtual college head in the authority that looks after the child.

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<sup>3</sup> <http://westmidlands.procedures.org.uk/pkpzs/regional-safeguarding-guidance/children-affected-by-gang-activity-and-youth-violence>

<sup>4</sup> <https://www.gov.uk/government/collections/county-lines-criminal-exploitation-of-children-and-vulnerable-adults>

## **5(e) Children Potentially at Greater Risk of Harm** Children who need a social worker (Child in Need and Child Protection Plans)

Sometimes students may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a student has a social worker, and the designated safeguarding lead may hold and use this information so that decisions can be made in the best interests of the student's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and colleges/colleges to safeguard and promote the welfare of children.

When a student has a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the [Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection'](#) contains further information; the conclusion of the review, ['Help, protection, education'](#) sets out action Government is taking to support this.

### **What college staff should look out for**

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory EHCP)
- has a mental health need;
- 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 or county lines.
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education

## **5(f) 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 the College'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, and,
- 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.

Students with particular skills 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 DSL (or a deputy), will 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.

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.

## **5(g) Domestic Abuse**

### **Ending Domestic Abuse Save Lives**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of sex or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.

We will ensure that our students are educated to ensure they understand what a healthy relationship looks like, for example by using the WSCB Healthy Relationship – a whole college approach and resources from the WCC Domestic Abuse and Sexual Violence website.

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people. We will consider a referral to MARAC (multi agency risk assessment conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders. We will continue to provide help and support in order to safeguard children. This will usually be led by the designated safeguarding lead. MARAC does not replace a referral to children social care. We may also make referrals to the Family Front Door where the threshold for social care intervention is met.

[WCC Domestic Abuse Guidance](#)

## **5(h) Forced Marriage – a form of Domestic Abuse and a crime in England and Wales**

*Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the college/college.*

A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or another form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Staff understand we could potentially play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 34-36 of which focus on the role of colleges and colleges. College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk).

### **Forced marriage: what educators should NOT do**

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the Police, Children's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety attempt to be a mediator

All forms of Honour Based Abuse (HBA) are abuse (regardless of the motivation) and are 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 HBA, or already having suffered HBA.

### **5(i) Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The DSL (and any deputies) will refer to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, 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.

We recognise that 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 on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

### **5(j) Female Genital Mutilation (FGM) (so-called honour-based violence)**

All staff who directly deal with students have received FGM training. We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV). We also provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

So-called 'honour-based' abuse (HBA) 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. We are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and are 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 HBA, or already having suffered HBA.

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As

appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers.

### **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 may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, 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 and will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless a teacher has good reason not to, we will still consider and discuss any such case with the college's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### **5(k) Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are well placed to observe students and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Tutors and Learning Support staff have received mental health champion training for this. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how students' experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy.

The Safeguarding Officer is also the Designated Lead for Mental health and has received training for this, to advise and support staff and students and is leading on implementing a whole-College strategy in relation to Mental Health. The tutorial programme also contains tutorials on promoting positive mental health and how to access support for mental health both inside and out of college. If we have a mental health concern about a student that is

also a safeguarding concern, immediate action will be taken, following our child protection policy and speaking to the designated safeguarding lead or a deputy.

We have access to a range of advice to help identify students in need of extra mental health support, this includes working with external agencies. More information can be found in the [Mental Health and Behaviour in Colleges guidance](#), which we may also follow as best practice.

## **5(l) Modern Slavery and the National Referral Mechanism**

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including colleges) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

## **5(m) Child-on-child sexual violence and sexual harassment**

We recognise that young people are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); initiation / hazing type violence and rituals.

We recognise the term 'victim' to refer to those who have been subjected to abuse. But we recognise that not every victim will view themselves as such, also we use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. We do however caution the use of this term as in some cases the abusive behaviour will have been harmful to the perpetrator as well

Abuse perpetrated by young people can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the young person exhibiting the harmful behaviour.

All staff, and the safeguarding governor have received training about sexual violence and sexual harassment and are aware of how to recognise and manage such issues. Staff have been given the skills to identify and manage harmful sexual behaviour. Staff are aware that some groups are potentially more at risk, for example, girls, students with SEND and LGBT students.

Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. All our staff understand, that even if there are no reports in College it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse, they should speak to the designated safeguarding lead (or deputy).

All our staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Staff must never tolerate or dismiss concerns relating to peer on peer abuse, must not pass it off as 'banter', 'just having a laugh' or 'part of growing up'.

Staff are aware that such incidents and / or behaviours can be associated with factors outside the College and can occur between young people outside the College. Staff, and particularly the DSL, should always consider the context in which such incidents and /or behaviours occur.

**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);
- up-skirting, 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; and
- 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).

All our staff are clear as to the college's or college's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All our staff will be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All our staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for colleges and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its Criminal exploitation of children and vulnerable adults: county lines guidance.

All our staff are aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include but may not be limited to:

- bullying (including cyberbullying).

- 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);

Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

### **What is sexual violence and sexual harassment?**

It is important that college staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (colleges 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; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and upskirting.

Where abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Student Conduct and Anti-Bullying policies. Where a student discloses safeguarding allegations of a sexual nature against another student in the same setting, the DSL should refer to the [West Midlands Safeguarding Children procedures website](#) and seek advice from the Family Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the College is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection recording forms.

Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education 2025 and the DfE guidance '[Sexual violence and sexual harassment between children in colleges and colleges](#)'.

Support for the victims of abuse will be in line with support outlined in the College's Student Conduct and Anti-Bullying policies. For victims of sexual abuse, the College should follow advice given by Children's Social Care and consider using external agencies, such as Early Help or [West Mercia Rape and Sexual Abuse Support Centre](#) to support any strategies that they may be able to provide within College.

Depending on the nature of abuse, the College may need to consider providing measures to protect and support the victim, the alleged perpetrator and other students/or staff in the College by means of a risk assessment. The risk assessment should be recorded and kept under review.

For more information on action following a report of sexual violence and/or sexual harassment, see Peer On Peer Abuse (inc sexual violence and sexual harassment policy

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Support for the victims of abuse will be in line with support outlined in the College's Behaviour and Anti-Bullying policies. For victims of sexual abuse, the College should follow advice given by Children's Social Care and consider using external agencies, such as Early Help or [West Mercia Rape and Sexual Abuse Support Centre](#) to support any strategies that they may be able to provide within College.

Depending on the nature of abuse, the College may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the College by means of a risk assessment. The risk assessment should be recorded and kept under review.

## 5(n) Serious Violence

There are a number of indicators which may signal that students are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from College

- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

### **5(o) Use of College Premises for Non-College/College Activities**

Worcester Sixth Form College will ensure that when/if hire out our college facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities), appropriate arrangements are in place to keep children safe.

When services or activities are provided by name of College under the direct supervision or management of our College the arrangements for child protection will apply.

Where an external body is providing community or extra-curricular activities we will ensure seek assurance that appropriate safeguarding and child protection policies and procedures are in place (including inspecting these as needed); and ensure that there are arrangements to lease with WSFC on these matters where appropriate. We will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

All external organisations using our facilities are required to sign a safeguarding agreement and provide a copy of their safeguarding policy.

### **5(p) Young people with families 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. The National Information Centre on Children of Offenders [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Barnados also provide the [Invisible Lives](#) programme to which a student/family can be referred for support.

**WHAT TO DO IF ...**

... a student discloses abuse to you

- react calmly
- be aware of your non-verbal messages
- keep responses short, simple, quiet
- don't stop the student who is freely recalling significant events
- don't interrogate – observe and listen
- avoid comment on the alleged perpetrator
- never offer absolute confidentiality; advise at an early stage that information that a student may be at risk, may require that you must speak to someone else in College
- reassure them that they can be involved in such a discussion
- don't end the conversation abruptly, tell the student what will happen next
- do not discuss the case with other staff
- make a written note of what was said and what you observed
- **Follow procedures** as before

**All staff should be familiar with the Safeguarding Policy which along with other materials is available on the repository**

**THE SAFEGUARDING TEAM**

Designated Safeguarding Lead

**Graham Williams**

(ext. 612, [graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk))

Safeguarding Officer

**Heather Anderson-Stevens**

(ext.614, [heather.andersonstevens@wsfc.ac.uk](mailto:heather.andersonstevens@wsfc.ac.uk))

Deputy Safeguarding leads

**Ellie Clayton:** (ext 615, [ellie.clayton@wsfc.ac.uk](mailto:ellie.clayton@wsfc.ac.uk))

**Catherine McPherson:** (ext 626, [catherine.mcpherson@wsfc.ac.uk](mailto:catherine.mcpherson@wsfc.ac.uk))

**Michelle Collings:** (ext 617, [michelle.collings@wsfc.ac.uk](mailto:michelle.collings@wsfc.ac.uk))

**Rachel Briggs:** (ext 625, [rachel.briggs@wsfc.ac.uk](mailto:rachel.briggs@wsfc.ac.uk))

**College Counsellor –Catherine Power** (based in Student Services)

**Mental Health & Wellbeing Officer – Sam Murphy** (based in Student Services)

In the absence of all of the above, concerns should be directed to **Ed Senior, Principal** (ext 606, [ed.senior@wsfc.ac.uk](mailto:ed.senior@wsfc.ac.uk)).

**Governor with responsibility:** Elle Beale

If staff have serious concerns about the College they should refer to the Trust Whistleblowing Policy. A whistleblowing helpline is available to enable those working for the College to report concerns to an external agency in complete confidence. The helpline can be contacted by Freephone telephone **0800 197 2814**, by email to **blowingthewhistle@cic-eap.co.uk** or through the secure user anonymous website **www.blowingthewhistle.co.uk**.

**HELP?**

[www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)

[www.ceop.police.uk](http://www.ceop.police.uk)

[www.nspcc.org.uk](http://www.nspcc.org.uk)

ChildLine 0800 1111

**SAFEGUARDING****PROTECTION BRIEFING**

**JANUARY 2026**

## PROTECTION

... is about activity undertaken to protect specific children/vulnerable adults who are suffering or are likely to suffer significant harm from abuse.

The aim is to make sure they are kept safe both at home and in the education setting.

## WHAT IS ABUSE?

A person may be said to be abusing a child or young person if they inflict harm or fail to act to prevent harm. There are four types of abuse: \*\*

- **Physical abuse:** 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:** 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, 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

- **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, including assault by penetration (e.g. 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 on-line images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

**Coercion control:** is a pattern of behaviour that enables one person to exert power over another person. This could be threats of violence, financial control, sexual coercion, gaslighting and using insults and degrading comments to make the person not feel good enough. This can be between partners, friends or family, and is difficult to spot,

with subtle comments or behaviours, but is extremely damaging.

\*\* From: 'Working Together to Safeguard Children' (2023)

**Extremist Ideologies:** Through the Prevent Duty, we also have a legal responsibility to protect students from being drawn in to groups that promote hatred, discrimination and terrorism.

## WHAT TO DO IF ...

... you suspect abuse or fear that a student is being drawn towards extremist ideologies

**See** the Designated Person for Safeguarding Referrals or one of the other team members (in their absence). **Identify** and record with them, what observations, facts, or information have raised your concern. Notes about concerns can be recorded on an 'initial concerns form'. There are copies in each department office or in repository/safeguarding.

**Initially** this discussion could be on a 'no name' basis to assist you in assessing the concerns you have. **Alternatively** you may meet the Designated Person with the student or you may have alerted the student to your need to speak to the Designated Person. **Together** you will decide what action, if any, is required. **Consultation** with the student will normally form a crucial part of the process.

The Designated Person for Safeguarding Referrals is responsible for:

- offering information, guidance and support to staff involved with child protection issues
- **making contact with outside agencies**
- keeping a log of issues raised in College.

**Thank you...**

**For your interest in helping the students and staff at the College by becoming a volunteer or regular visitor.**

As a College we are committed to safeguarding and promoting the welfare of all our students and trust that you will contribute to this.

### **What is your responsibility?**

All adults who come into contact with children, young people or vulnerable adults through their every-day work whether paid or voluntary have a duty to safeguard and promote their welfare. None of the above should be allowed to suffer abuse at home or in college.

**No concerns should be left unreported.**

We hope this leaflet will give you some guidance and support in your role. Please ask the person who gave it to you if you are unclear about anything in it; we are always happy to discuss the issue and answer questions. Please keep this somewhere safe for future reference.

*Thank you for the time you have given to reading this and working with us.*

## **The Safeguarding Team**

Designated Safeguarding Lead

**Graham Williams**

(ext. 612, [graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk))

Safeguarding Officer

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**Michelle Collings**

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**Rachel Briggs**

(ext 625, [rachel.briggs@wsfc.ac.uk](mailto:rachel.briggs@wsfc.ac.uk))

Other member

**College Counsellor**

**Mental Health & Wellbeing Officer**

In the absence of all of the above, concerns should be directed to Ed Senior, Principal (ext 606, [ed.senior@wsfc.ac.uk](mailto:ed.senior@wsfc.ac.uk)).

Governor with responsibility: Elle Beale

### **Help?**

[www.safeguardingworcestershireshire.org.uk](http://www.safeguardingworcestershireshire.org.uk)

[www.ceop.police.uk](http://www.ceop.police.uk)

[www.nspcc.org.uk](http://www.nspcc.org.uk)

**ChildLine: 0800 1111**



# **Safeguarding Briefing for Volunteers and Regular Visitors**

**JANUARY 2026**

### **Checks**

Please ensure that you sign in at Visitors' Reception, wear your Visitor's badge and return it to Reception before you leave.

Please inform HR if you have become the subject of any criminal investigation, caution or conviction. This helps protect you as well as the young people in your care.

### **What to do if you are worried about a student?**

If whilst working with a student you become concerned about their safety by their appearance, behaviour, comments and extremist views they or others make please

**See** the Designated Person for Safeguarding Referrals or one of the other protection team members in their absence. The Prevent Duty makes it a legal responsibility to pass on information about a student who you believe may be at risk of becoming involved in radical ideas and extremism

**Identify** and record with them, what observations, facts, or information have raised your concern.

**Initially** this discussion could be on a 'no name' basis to assist you in assessing the concerns you have.

**Alternatively** you may meet the Designated Person with the student or you may have alerted the student to your need to speak to the Designated Person.

**Together** you will decide what action, if any, is required.

**Consultation** with the student will normally form a crucial part of the process.

### **What will the Designated Person for Safeguarding Referrals do?**

They are responsible for:

- offering information, guidance and support to staff involved
- making contact with outside agencies
- keeping a log of issues raised in College

### **What to do if the alleged abuser is a member of the College staff?**

You should report this directly to Ed Senior, Principal. If the alleged abuser is the Principal, then please report to the Chair of Governors, Sean Devlin, or if you are unable to contact him, the Vice Principal.

### **How to ensure your behaviour is appropriate**

We ask all members of the College community to treat each other with courtesy

and respect and to ensure the safety of others.

If you are unclear about your responsibilities, please speak to whoever is supervising your work.

### **What to do if a student discloses that s/he is, or has been, or might be harmed?**

- react calmly, keep responses short, simple, quiet
- be aware of your non-verbal messages
- don't stop the student who is freely recalling significant events
- don't interrogate – observe and listen
- avoid comment on the alleged perpetrator
- never offer absolute confidentiality; advise at an early stage that information that a student may be at risk, may require that you must speak to someone else in College
- reassure them that they can be involved in such a discussion
- don't end the conversation abruptly, tell the student what will happen next
- do not discuss the case with other staff
- make a written note of what was said and what you observed
- **Follow procedures** as outlined earlier

### **Other General Information**

#### **Fire and emergency evacuation**

If the fire alarm sounds (continuous sounding of a siren), your host will direct you to the nearest exit. Please leave the building immediately and assemble on the carpark to the rear of the building. You will be directed to report to a Fire Marshall.

#### **Lockdown**

In the event of an incident requiring lockdown (signalled by an intermittent bell), please follow the instruction of the member of staff accompanying you.

#### **First Aid**

Please ask at Visitors' Reception if you need assistance.

#### **Accidents and Incidents**

Please report these to Visitors' Reception.

### **Other General Information**

#### **No Smoking Policy**

The College site is non-smoking (this includes the use of vapes or e-cigarettes).

#### **Access to the Internet**

All users of the College system and Wi-Fi must comply with the Acceptable Use Policy which is available on request.

#### **Visitors' Toilets**

Located on the ground floor. Please ask at Reception for directions.

#### **Parking and Disabled Access**

Parking is available in our visitors' car park. There is ramp or flat access to all the main buildings. Other floors can be accessed via a lift.

**Thank you for taking the time to read this information and supporting the College in ensuring the safety of our staff, students and visitors.**



# **Safeguarding Advice for Visitors**

**PLEASE READ THE  
INFORMATION IN THIS  
LEAFLET**

## **Welcome to Worcester Sixth Form College**

Thank you for visiting the College. As a College we are committed to safeguarding and promoting the welfare of all our young people and everyone who visits our College has a responsibility to make sure that all our staff and students are safe.

We ask all members of the College community to treat each other with courtesy and respect and to ensure the safety of others.

We are committed to the values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and expect all staff, students and those who visit the College to adhere to these values.

The College's Safeguarding Policy is available on our website ([www.wsfc.ac.uk](http://www.wsfc.ac.uk)) or from reception on request.

Please take a few moments to read this leaflet which includes important information about your visit.

## **Keeping everyone safe**

As a visitor to the College you must:

- Ensure that you sign in at Visitors' Reception, wear and clearly display your visitors' badge at all times and return it to reception when you leave;
- Comply with the agreed supervision arrangements throughout your visit. If you are working in a one to one situation with a student, we must have confirmation that all the necessary safeguarding checks have been carried out including the enhanced DBS check and a speaker declaration form should be completed;
- Comply with any reasonable instruction from the member of staff accompanying you during your visit;
- Ensure that any contact with students or staff is appropriate to the purpose of your visit. You must not have any physical contact with any student;
- Be mindful that any interactions with students or staff should adhere to the values to which the College is committed;
- Not use cameras or take photos unless prior permission has been sought.

## **Keeping everyone safe**

If you witness anything during your visit which causes concern for the safety and wellbeing of students and staff, please bring it to the attention of the member of staff accompanying you immediately.

Alternatively, please contact:

### **Graham Williams**

Designated  
Safeguarding Lead  
[graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk)  
01905 362612

or

Heather Anderson-Stevens  
Safeguarding Officer  
[heather.anderson-stevens@wsfc.ac.uk](mailto:heather.anderson-stevens@wsfc.ac.uk)  
01905 362614

or

### **Ed Senior**

Principal  
[ed.senior@wsfc.ac.uk](mailto:ed.senior@wsfc.ac.uk)  
01905 362606

### **Ladders**

Contractors should provide appropriate ladders that are manufactured to BS2037 and they should be in good condition. Ladders that will conduct electricity must not be used where there is danger from overhead electrical conductors.

All ladders must be secured at the upper resting place or at the bottom. Ladders should rise at least 1 metre above the place of landing, unless there is a safe handhold. At the end of the day all ladders must either be removed from the site, locked away or left in a state that prevents access.

### **Tools & Equipment**

- All tools, equipment and materials necessary for the work must be in a safe condition for use.
- Only training personnel are permitted to use or operate tools and equipment, and the tools must only be used for the purpose for which they were designed.
- Contractors are not permitted to use any College equipment or tools without prior permission from the Premises & Estates Manager.

### **Roof and Overhead Working**

When working over 2 metres above floor level, necessary guarding, harnesses, safety nets etc must be provided.

Ensure scaffolding is erected and dismantled using safe working methods.

All equipment and materials must be correctly stacked and secured.

### **Other General Information**

#### **No Smoking Policy**

The College site is non-smoking (this includes the use of vapes or e-cigarettes).

**Fire and emergency evacuation:** If the fire alarm sounds (continuous ringing), your host will direct you to the nearest exit. Please leave the building immediately and assemble on the main carpark. You will be directed to report to a Fire Marshall.

If you discover a fire, sound the alarm from the nearest alarm point. Turn off all sources of heat and make safe all hazardous equipment.

**Lockdown:** In the event of an incident requiring lockdown (signalled by five intermittent rings of the bell), please follow the "Run, Hide, Tell" procedure which will be explained.

**Access to the Internet:** All users of the College system and Wi-Fi must comply with the Acceptable Use Policy which is available on request.

**Visitors' Toilets:** Located on the ground floor. Ask at Reception for directions.

**Parking and Disabled Access:** Parking is available in our visitors' car park. There is ramp or flat access to all the main buildings. Other floors can be accessed via a lift.



# **Health, Safety & Safeguarding Guide for Contractors**

**PLEASE READ THE  
INFORMATION IN THIS  
LEAFLET BEFORE  
COMMENCING WORK**

Thank you for visiting Worcester Sixth Form College. As a College we are committed to safeguarding and promoting the welfare of all our young people and everyone who visits our College has a responsibility to make sure that all our staff and students are safe.

We ask all members of the College community to treat each other with courtesy and respect and to ensure the safety of others.

We are committed to the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and expect all staff, students and those who visit the College to adhere to these values.

The College's Safeguarding Policy is available on our website ([www.wsfc.ac.uk](http://www.wsfc.ac.uk)) or from reception on request.

If you witness anything which causes concern for the safety and wellbeing of students and staff, please bring it to the attention of the Premises & Estates Manager. Alternatively, please contact Graham Williams, DSL ([graham.williams@wsfc.ac.uk](mailto:graham.williams@wsfc.ac.uk), 01905 362612) or Ed Senior, Principal ([ed.senior@wsfc.ac.uk](mailto:ed.senior@wsfc.ac.uk), 01905 362606)

**Contractors must:**

- Sign in and out at Visitors' Reception;
- Wear and clearly display the issued contractor badge at all times;
- Comply with agreed supervision arrangements;
- Ensure that any contact with students or staff is appropriate to the purpose of your visit. You must not have any physical contact with any student. Be mindful that any interactions with students or staff should adhere to the values to which the College is committed;
- Not use cameras or take photos unless prior permission has been sought;
- Ensure that the work to be undertaken has been approved by the Premises & Estates Manager;
- Park in the visitors' car park and do not block any access points;
- Take necessary precautions to protect others;
- Be responsible for displaying warning signs in any area of work;
- Effectively control any dust, fumes or impurities that may cause harm to others;
- Ensure the working area is kept clean and tidy, do not block corridors, firefighting equipment and fire exits;
- Remove your own waste.

**Accidents, Emergencies & First Aid**

First Aid is the responsibility of the contractor but in the case of an emergency, a First Aider should be contacted via Reception. All accidents must be reported.

**Permits to work**

Permits to work are required prior to any work commencing. These are obtained from the Premises & Estates Manager for the following works: Electrical; General (including excavations); Hot works; Working in confined spaces; Working with hazardous materials; and Working at heights.

**Asbestos**

Asbestos Survey information on the location of any asbestos that may be disturbed, is available from the Premises & Estates Manager and will be discussed prior to work commencing.

**Electricity**

- All Electrical contractors must be NICEIC registered.
- Consent must be obtained before either making an electrical connection or terminating power.
- All materials used must be appropriate to British standards.
- All cables, plugs and sockets are to be of the correct type and rating and defect free.
- All equipment, plant and tools should comply with earthing requirements.
- Walls should be scanned prior to fixing becoming fitted.
- All portable electrical equipment must comply with statutory requirements set out in the Electricity at Work Act 1989.

### Procedures for Dealing with Allegations Against a Member of Staff

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The College recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers.

The Safeguarding Policy and Managing Allegations policy both apply in the case of child protection allegations against a member of staff. The Safeguarding Policy covers the way in which the welfare of the young person should be promoted. The Managing Allegations covers how any investigations into the member of staff should be conducted and how the decision should be taken about any action against the member of staff.

The guidance set out in the document "*Keeping Children Safe in Education*" (Sept. 2025) should be followed, in particular, that contained in Part Four, "*Allegations of abuse made against teachers and other staff*". The procedures that follow are derived from that publication. For more information and procedures see 'Managing Allegations against Staff' policy

#### Low Level Concerns and how to report them ([KCSIE 2025](#) page 107)

Low level concerns about a member of staff will always be reported to the Principal and in the case of the Principal be reported to the Chair of the Local Governing Body.

If there are concerns about Supply Staff or Contractors these should be reported to their employer to ensure that any pattern of inappropriate behaviour can be identified. Staff are also encouraged to feel confident to self-refer if they feel that they have been in a situation which could be misinterpreted as being compromising or if they feel that they may have behaved in a way that falls below the expected standards of professionalism.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records will be retained by the Head teacher and will be reviewed regularly so that potential patterns of concerning behaviour can be identified. Should the level of concern reach the harms threshold the case will be referred to the LADO. Records will be retained until the individual ceases to be employed in the college.

#### Concerns about safeguarding practices within the college

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Any concerns should be raised with the College's senior leadership team.

### **Allegations against agencies and individuals**

As with any safeguarding allegation, if the College receives an allegation relating to an incident that happened when an individual or organisation was using the College premises for the purpose of running activities for children, the College will follow its safeguarding policies and procedures, including informing the LADO.

## *Staff Code of Conduct*

### **1 Introduction**

#### **1.1 Introduction**

Heart of Mercia Multi-Academy Trust (HoM) is committed to treating all members of its community with respect and courtesy. All staff and others working at HoM and its member academies are expected to maintain and generate confidence in the Trust and to support its good name in the community through the demonstration of high standards of personal conduct.

Learners, staff, and everyone involved in the life of the Trust have the right to expect that they will be protected by the Trust's duty of care to them. This Code of Conduct seeks to provide a framework of acceptable standards that will ensure a working and learning environment where honesty, integrity and respect are constantly reflected in personal behaviour. It also seeks to provide a framework to promote well-being in the workplace and to ensure that staff are supported and enabled to perform their professional duties.

All of those working for HoM are in a special position of influence and trust and are accountable for the way in which they exercise their professional responsibilities as educational workers, and the obligations of this trust are considerable. Staff are expected to exhibit behaviour that models the highest possible standards within the institutions of the Trust and the wider community.

#### **1.2 Purpose**

The purpose of this Code of Conduct is to help staff to be clear about the acceptable standards of behaviour expected of them while they are working for the Trust. In interpreting this Code, staff should act in a reasonable manner. The Code sets out expected standards of conduct in several areas. Breaches will be taken seriously and may result in disciplinary action.

Further guidance for staff can be found in the Trusts Guidance for Heart of Mercia Multi-Academy Trust Employees on Safer Working Practices

<https://heartofmerciamultiacademytrust.org.uk/wp-content/uploads/2024/10/Guidance-for-HoM-Staff-on-Safer-Working-Practices.pdf>

#### **1.3 Scope**

Whilst the Code of Conduct forms a part of the employment contract, some of the statements have an advisory dimension and should help to reduce the risk of allegations of misconduct, including improper or unprofessional conduct.

Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other

proceedings including barring by the Disclosure and Barring Service (DBS) from working in regulated activity or, for acts of serious misconduct, prohibition from teaching by the Teacher Regulation Agency (TRA).

The Code of Conduct is not intended to provide an exhaustive list of dos and don'ts, rather its intention is to indicate the principal areas of appropriate conduct and to illustrate the standards expected. Staff must remember that they are role models and should conduct themselves as such in their interactions with all members of the community at their academy and the wider Trust.

The Code of Conduct applies to all staff and workers employed by HoM and to volunteers who work on its behalf. References to 'staff' are taken to include all workers and volunteers as appropriate.

If staff are unclear about any aspect of it or if they are not certain whether a particular aspect of conduct is acceptable, they should seek guidance from their line manager, a senior member of staff at their academy, the HR officer at their academy, members of the Trust Executive and/or the Trust HR Director.

## 2 Staff Responsibilities

- 2.1 Staff must be aware of the standards of behaviour required by the Trust and are responsible for their own conduct and behaviour.
- 2.2 Staff are expected to understand and abide by all HoM policies and procedures, and those of individual HoM academies as appropriate.
  - HoM policies are published on the Trust website <https://heartofmerciamultiacademytrust.org.uk/about-us/policies-reports/#policies>
  - Policies of individual HoM academies are available from the relevant academy.

It is the responsibility of individuals to ensure that they are familiar with them.

- 2.3 All staff will consistently promote appropriate standards of learner behaviour, whether inside or outside of the classroom.
- 2.4 The welfare of our learners is of paramount importance. Staff must understand their responsibilities for, and be committed to, promoting, and safeguarding the welfare of children, young persons, and vulnerable adults whether responsible for, or in contact with, them.

Staff must not ignore, initiate, or encourage extremism. This includes the requirement to be alert to the risks of how learners can be drawn into extremism and to pass any

suspicions or relevant information to the Designated Safeguarding Lead at their Academy, or, in their absence, any member of the academies Safeguarding Team or the HoM Safeguarding Co-ordinator.

Staff are undertaking a regulated activity; it is an offence for anyone to undertake such activity if they are barred from doing so. Should any person during their work with the academy become barred, this will result in disciplinary action up to and including, the termination of their relationship with the Trust.

- 2.5** Staff have a duty to safeguard learners from abuse (physical, sexual, and emotional), neglect and from contextual safeguarding concerns. The duty to safeguard our learners includes the duty to report concerns about a learner to the designated safeguarding lead (DSL) or designated deputies. Staff must be familiar with the academies child protection and safeguarding policy and the latest version of the DfE guidance [Keeping Children Safe in Education](#).
- 2.6** Staff may only be absent from work where that absence is authorised, or they are ill. Absence would normally be in accordance with their academies policies for sickness and ill health management, leave of absence and/or staff development policies.
- Staff should always intend and plan to arrive for work on time and fulfil their work obligations at the times specified.
- 2.7** Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to perform their duties competently and appropriately supervise and ensure the safety and welfare of learners. Staff must not bring any illegal substance on to their academies site.
- 2.8** Staff must inform HR at their academy of changes to personal record details.
- 2.9** Staff should use positive language, statements, and strategies so that learners feel valued, can learn, and understand what we expect of them in any situation. This includes all forms of communication, whether in person or via written or electronic feedback and communication.
- 2.10** Staff are expected to always wear their academy identity lanyard or agreed alternative openly and visibly.
- 2.11** Staff must inform the Principal/Head of their academy in the event of a criminal conviction. This will be treated as strictly confidential information and disregarded unless it directly relates to work undertaken for the Trust.

- 2.12 Much of the Trust's work is of a confidential or personal nature. As such, it is bound by Data Protection legislation and the Freedom of Information Act (2000). Employees should not under any circumstances disclose information to anyone whom the Trust and/or its academies may consider has no right to receive it.

Staff must adhere to the Trust's Data Protection and Freedom of Information policies. These can be found at: <https://heartofmerciamultiacademytrust.org.uk/about-us/policies-reports/#policies>

- 2.13 Trust buildings and grounds are non-smoking sites. Trust staff are expected to refrain from smoking anywhere on a HoM academy site – this includes the use of e-cigarettes or vaping equipment.

### 3 Working with learners

- 3.1 Staff must ensure that all interaction with learners remain on a professional basis, is conducive to learners' educational success and is not open to misinterpretation. Staff act as role models for young people and should be mindful of the need to maintain positive interactions with learners at all times.

To assure safer working practice staff should refer to the Guidance for HoM Staff on Safer Working Practices and the document Professional and Personnel Relationships (cimpres.io), which is based on the advisory Guidance for Safer Working Practices for Adults Working with Children and Young People.

- 3.2 Staff will treat all learners fairly, regardless of their age, disability, gender reassignment, pregnancy or maternity, sex, race, religion or belief or sexual orientation, in accordance with the Equality Act (2010).
- 3.3 Staff should refrain from interaction with current learners which could lead to:
- any form of romantic or sexual relationship with a learner whether they are under 18 or an adult is prohibited. It is an offence under the Sexual Offences Act (2003) for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. Any improper relationship as defined above is a breach of trust and will result in disciplinary action.
  - a personal friendship – it is accepted that colleagues may associate with current learners outside of school/college, for example in clubs, societies, sports teams and through familial contacts. Where this is the case, relationships must always be maintained on a professional basis and not be open to misinterpretation.

Learners must not be 'friends' with staff on personal social media sites. For further details on the use of social media in this regard please refer to the Guidance for HoM Staff on Safer Working Practices (available at <https://heartofmerciamultiacademytrust.org.uk/about-us/policies-reports/#policies>) and the acceptable use policy of the relevant academy of the Trust.

- c. a business, commercial or financial relationship.

Where a close personal relationship already exists with a learner (e.g., a relative), staff have a responsibility to disclose this in confidence to their line manager or a senior member of staff in the relevant academy. Such a relationship should be conducted appropriately to avoid negative perceptions from other members of staff or learners. Any such disclosure may need to be shared, in confidence and this would be discussed with the member of staff prior to any disclosure.

- 3.4 In line with the Trust's child protection and safeguarding policies, and individual academies Acceptable Use policies, staff should not communicate with learners through personal email accounts or personal social networking sites, even on educational matters, but should use official HoM communication networks. Staff must ensure that any communication is both professional and necessary. It is recognised that during trips and visits, it may be necessary to use personal contact details to ensure the safety of learners; however, a school/college mobile phone may be provided for staff accompanying learners on trips.

Staff must maintain strictly professional boundaries, including all communications whether on or off academy premises and during or outside academy hours. Non-educational, private, or off-hours contact with learners—such as sending social media posts or personal messages—is strictly prohibited.

- 3.5 Staff will not use any form of physical intervention unless such action is designed to prevent harm or injury to a learner or others. Staff should not place themselves at risk in such a situation and should always endeavour to call for assistance in such circumstances. All incidents of this nature must be reported to the DSL at their academy and to the Head/Principal.
- 3.6 Staff will promote learners' health, safety and welfare and ensure that any safeguarding concerns are brought to the attention of the DSL or designated deputies at their academy.

## 4 Standards of Behaviour

- 4.1 HoM has the highest expectations of each member of staff. They act as role models and set an example for our learners and each other. Staff must maintain the highest standards of honesty and integrity in their work.

- 4.2 Staff should always engage in professional contact with learners and forge positive, professional relationships with colleagues.

- 4.3 Staff should treat learners, each other and all other parties with fairness, respect and courtesy at all times and should not display discrimination, bullying, harassment, or discourteous behaviour of any kind. HoM takes a zero-tolerance stance on all harassment, including sexual harassment. Any breach of this may lead to disciplinary action, including dismissal for gross misconduct.

Allegations concerning the bullying and harassment of other staff will be dealt with under the HoM Anti-Bullying and Harassment policy, or the existing local Bullying and Harassment policy where a college or school has newly joined the Heart of Mercia Multi Academy Trust.

- 4.4 Political and religious activity at work that could be interpreted as contradictory to the interests of the HoM Trust, or its academies should not be undertaken.

## 5 Conduct outside of work

- 5.1 The off-duty hours of staff are not the concern of the Trust, except where private interests, conduct or activities could conflict with duty to the Trust, including bringing the Trust and/or its academies into disrepute. Staff should be mindful that their conduct outside of work is not open to misinterpretation or misrepresentation.

In accordance with Keeping Children Safe in Education and the Teachers' Standards, staff must maintain professional boundaries and uphold public trust in all settings and at all times—whether on or off academy premises and during or outside academy hours.

- 5.2 Staff should be circumspect in their use of social networking sites and must not discuss Trust business or Trust issues, including that of individual academies of the Trust, on their personal social networking sites. The rationale for these stipulations, over and above child protection, is to protect staff themselves from false allegations or reputational damage, as well as to protect the Trust or its academies' reputation.

Staff must be mindful of their online presence so as not to bring themselves, and the Trust and its academies into disrepute or leave themselves open to misrepresentation and misinterpretation.

- 5.3 In line with the Trust's financial regulations and [Anti-Fraud Policy and Procedures](#), all members of staff must declare any business interests outside of work that may be connected either to the supply of goods or services to the Trusts and/or its academies or be rewarded through association with the Trust and/or its academies.

- 5.4** Whilst minor gifts or hospitality may be considered as part of the courtesies of working life, staff should be cautious about all gifts and hospitality. Where a situation arises where staff are uncertain of whether it would be appropriate to accept the offer of a minor gift or hospitality, the offer should be declined, or advice should be sought from their Academy Principal or Head.

In line with the Trusts Anti-Fraud Policy and Procedures, members of staff should not accept any gifts, rewards, or hospitality from any individual or organisation with whom they have contact in the course of their work such that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a decision or having treated the person who provided the gift more favourably than others, as a consequence of receiving the gift, reward or hospitality. Similarly, members of an employee's family should not receive such gifts or hospitality from actual or potential contractors or suppliers to the Trust and/or its academies.

**5.5 Additional employment or activities**

Staff should not enter into any other employment or activity which would interfere with their duties for the Trust.

- i. Teachers have a contractual duty to inform the Trust if they accept employment additional to their work at their academy. Teaching staff are not permitted to provide any form of paid private tuition to learners at their academy of the Trust, either individually or in groups, at any location, to prevent any perceived or real conflict of interest.
- ii. The Trust welcomes its staff undertaking examination marking (where the exam board is one used by the Trust for the relevant subject) as it believes this is of benefit to learners, as well as to staff's understanding and professional development. Staff can therefore mark on academy sites, where this does not interfere with their school or college duties, with notification to their line manager and the express permission of their Head/Principal. Staff who do so are reminded of the need to observe examination board rules regarding confidentiality and discretion when undertaking examination marking.

## **6 Representing the Trust**

- 6.1** To preserve and enhance the reputation of the Trust, staff must:
- a. obtain approval from and consult with their Head/Principal before initiating any contact with the media or giving information to the media.
  - b. ensure that electronic communication and telephone calls are always professional in tone, style, and content.
  - c. maintain a high degree of professionalism in relations with learners, parents, and visitors to academies of the Trust.

- d. Dress appropriately for the professional environment of their academy and conduct themselves appropriately when acting in a professional capacity and with due regard for the conclusion's others may draw from their attire and demeanour.
- e. ensure that Trust/Academy notepaper and the Trust/Academy logo and branding are used only by staff or by learners whom they are supervising when representing the Trust/Academy in an official capacity.

## **7 Trust property**

**7.1** To protect the environment in academies of the Trust and their physical resources staff must ensure that:

- a. Academy equipment is treated correctly, and damage is reported to the relevant estates or IT support team as appropriate.
- b. Energy and other resources are conserved and used in a sustainable manner.
- c. In the interests of security, equipment is secured or locked away (where possible) when not in use and windows and external doors are closed when a room is vacated.
- d. Any actual or potential health and safety problem is immediately brought to the attention of the Estates Manager in the relevant academy of the Trust.

## **8 Compliance and Verification**

**8.1** HoM requires all its employees to adhere to this staff code of conduct. It is unacceptable professional conduct to misrepresent themselves, their colleagues, or learners with regard to qualifications, health, contractual duties, or other behaviour which unfairly detracts from the position of others or confers personal advantage.

The Trust acknowledges it has the responsibility to give praise where due and reserves the right to act when performance or conduct are deemed unsatisfactory. Failure of employees to act in accordance with the principles and requirements set out above will almost inevitably lead to the employee being in breach of this code of conduct, and disciplinary action could result.

The Chief Executive, senior post holders of the Trust and other senior staff in academies of the Trust are responsible for ensuring that the Trust's disciplinary procedures are adhered to when initiating and supervising investigations into alleged breaches of this code of conduct by members of staff. The Trust undertakes that its code of conduct is published and made widely available.

**8.2** The Trust has procedures by which staff and learners can express genuinely held concerns about behaviour or decisions they perceive to involve serious impropriety. Such concerns will be investigated with every reasonable assurance of confidentiality as appropriate.

- 8.3** The Trust encourages employees to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. Staff should refer to the [HoM Whistleblowing Policy](#) which seeks to balance the need to allow a culture of openness against the need to protect other employees against vexatious allegations or allegations which are not well-founded. This can be found at: [Policies & Key Documents | Heart of Mercia Multi-Academy Trust](#)

## 9 Equality Impact

The Trust's responsibilities towards promoting equality, diversity and inclusion have been considered when drafting this policy.

Date of review	Date agreed	LGBs	MAT Board	Review date	Comments
September 2025	November 2025	Spring 2026	December 2025	September 2026	

## Guidance for Staff on Safer Working Practices

It is recognised that most adults who work with students act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for students in their care. Achieving these aims is not always straightforward, as much relies on student and staff interactions where tensions and misunderstandings can occur. This document aims to reduce the risk of these misunderstandings and is a supplement to the **Code of Conduct for Staff**.

There will be occasions and circumstances in which staff have to make decisions or take action in the best interest of a student which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the student in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a line manager. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

**Working with Students Alone:** You should avoid this if you feel the student is likely to put you at risk. You may wish to ask another member of staff to be present and you should ensure that there is visual access and/or an open door in one to one situations. Always report any situation where a student becomes distressed or angry. All work with students and parents should usually be undertaken in College or at another recognised workplace and any home visit in response to an urgent or specific situation should be agreed with the member of staff's line manager. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote locations. Visits should not be made alone and staff should have access to a mobile telephone and emergency contact.

**Transporting Students:** You do not have an obligation to transport students in your own vehicle. If you do, you should ensure that you have the appropriate insurance that permits business use. If the arrangement is planned, it forms part of the **College's Outdoor / Off Site Activities Policy** and appropriate risk assessments are required. In the case of an emergency or when failure to do so would put the student at risk, you should report the nature of the journey, the route and expected time of arrival to your line manager or other member of staff as soon as possible. You may decide you would prefer another member of staff to accompany you or to ask the student to sit in the rear seat of the car.

**Trips and Visits:** Staff should take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Please consult the College's Outdoor / Off Site Activities Policy for specific guidance. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/student ratio and suitable gender mix of staff.

**Social Networking:** All staff are bound by the **Acceptable Use Policy for Staff** and you must ensure that you follow its requirements regarding the use of Social Media and in particular you must not invite students or accept invitations from them to become 'friends' on Facebook or other sites. You must ensure that your communications are open and transparent and you should avoid any communications that could be interpreted as 'grooming behaviour'.

**Other Social Interaction:** Staff should avoid arranging to meet students socially where their motives are unclear. You should also inform your line manager if you have any regular social contact with a student outside of College.

**Photography:** Under no circumstances should you be expected to use your own personal equipment to take images of students at or on behalf of the College. You should also follow College's procedures to obtain the consent of students for any photographs and images that are used in displays or for publicity purposes.

**Language:** All staff should avoid using personal or suggestive language that might give rise to offence or be misinterpreted. Care should be taken not to invade a student's personal space.

**Dress code:** As teachers and educational workers we act as role models for students and we represent the College to the public on whose support we rely. Staff should ensure that they dress in a manner which is functional and suitable for a working environment. Clothing or accessories that are distracting, offensive or that prevent effective communication are not acceptable.

**Infatuations:** it is not uncommon for students to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. The member of staff should make every effort to ensure that their own behaviour cannot be brought into question and does not appear to encourage this. Any member of staff who becomes aware that a student has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to their line manager.

**Physical Contact:** Staff should only touch students if it is clearly necessary to demonstrate or guide. Always explain to a student the reason why contact is necessary and what form that contact will take. Even innocent actions can be misconstrued. Staff should be aware of gender cultural or religious issues that may need to be considered prior to initiating physical contact and also that different students react in different ways to physical contact.

**Personal / Intimate Care:** This should be provided only by named individuals who have undergone training and who have agreed specific care arrangements with a student and their parent / guardian. In the event that an Adult student requires personal care HR must be notified and a suitable Barred List check carried out in addition to the DBS check.

**Restraint:** Reasonable force can legally be used to control or restrain a student but it should be the last resort. If restraint of a student is required, only the minimum necessary force should be used to prevent harm to the student, others or property. If dealing with students with behavioural difficulties, it is wise to obtain advice beforehand. Where restraint has been used, you should report it to a member of the Senior Leadership Team.

**Whistleblowing:** This is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. For further details please consult the Trust's Whistleblowing Policy in Repository.

**If you are in doubt you should seek advice about safer working practices from your line manager, a Head of Year or a member of SLT**

References: **Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (revised 2015)**

## Guideline for Managing Bereavement and Traumatic Incidents

### Introduction

Worcester Sixth Form College believes in adopting a holistic approach to the support and care of its students. When a bereavement occurs it can effect many people who knew the individual not just the family. To this end the whole community, both inside and outside the College, should be given access to appropriate support and advice if required.

### The Aim

These Guidelines are intended to reflect the positive ethos our caring community wishes to nurture.

The intention should be to ensure that all students and all members of staff faced with bereavement are provided access to appropriate support.

This support should include the opportunity for them to express their feelings in a safe environment, to be given space and time to come to terms with the loss and access to specialist advice if necessary. Furthermore, the reaction of the individual and community at large should be monitored over time.

### Procedures

Once the situation occurs concerning a bereavement the following steps should be taken:

- Contact should be made with the family to ascertain the facts and offer support.
- Staff will be informed and decisions taken concerning the best way to inform students and implement the internal mechanisms for support that are required.
- Students will be informed in the agreed manner.
- Other agencies will be informed if appropriate.
- If appropriate, a press statement will be prepared and a strategy for dealing with the media agreed with the family.
- Discussions will take place concerning attendance at the funeral and any memorial service agreed with the family.
- Basis information will be recorded for purposes of review.

### Responsibilities

The management of bereavement is a whole College issue but there are clear lines of accountability. The following summarises the main areas of responsibility:

The Principal/Senior Leadership Team - will co-ordinate and respond to any enquires made by the media.

Tutor/Head of Year - to be the first point of contact for the family.

All Staff - to offer support as appropriate to students in the wider College community.

The College Counsellor - to offer support and a safe environment to all students and all staff who wish to share their grief. To advise the Senior Leadership Team as required.

Senior Leadership - to seek support/advice from Faith Support representative (e.g. Chaplains, WASP) as appropriate

## **Training**

Key staff should have the opportunity to undertake relevant training in the management of bereavement.

## **Monitoring and Evaluation**

The effectiveness of these Guidelines will be regularly monitored and evaluated by the Senior Leadership Team. The methods adopted are likely to include:

- Obtaining feedback from students and parents affected by bereavement.
- Setting up and obtaining focus groups of staff and pupils.
- Feedback from Tutors involved in supporting a bereavement situation.
- Discussion with relevant personnel.
- Discussions with external agencies involved (as appropriate).

## **Breaking the news of the death of a member of the College community**

A death may be expected or unanticipated. It is important to get accurate information to the people who need it, when they need it. Otherwise there will be considerable confusion as well as shock and upset. Consideration of the following points can help to lessen the possibilities of a tragedy becoming a crisis:

- Put into action Worcester Sixth Form College Bereavement Policy.
- Allow opportunity for people to express their feelings if they want to. Respect those who may not want to do this.
- Give accurate and appropriate information. Even if the news is difficult it is best to give it. Both students and staff will cope better if they have accurate information. A lack of information may lead to rumours developing.
- Give information about what will be happening in the future. Are there planned memorial events or other consequences? This information eases anxiety about what will happen next.
- Liaison with the family is important. As well as expressing sympathy it is important to know the wishes of the family at this time.
- Liaison with other agencies may also be necessary; College Support Services, Health Agencies, Religious Leaders.
- Staff may also need support and to be given the opportunity to express their feelings. It is essential that staff are supported in a way that is appropriate for them.
- After talking to the class as a whole, follow up with individuals later. Check if there is anybody who is not there who needs to know. Are any students absent?
- Try to identify any students who may be particularly vulnerable, need special attention, or who may have experienced previous losses and find their grief reawakened.
- If any staff or students were particularly close to the deceased, they should be given the opportunity to be particularly involved in the process. For example, close friends might wish to choose a song or need a poem at the funeral or memorial service.
- Let students know who may be available to listen and talk, where and when.
- Individuals should be allowed to express their feelings in a manner that is helpful to them. Loss is painful and part of adapting to the loss will, for many, involve experiencing that pain. Some students may find it difficult to act appropriately which may be a reflection of their anxiety or uncertainty.
- Each student's reaction will be different. There is no right or wrong way to grieve. However, staff should look for extreme reactions or signs that there may be particular problems with an individual.

## **Creating a safe environment for expressing emotions**

Staff might try to create a mutually supportive atmosphere within the class or Tutor Groups such that students feel able to ask questions and express any feelings that they feel able to share. They should also acknowledge that people will feel different things. Some may be sad, others confused or appear indifferent. Whatever those feelings are, they are acceptable and valued. Crying is an appropriate reaction and no-one need be discouraged from this, though it is important for all to have a sense of dignity and some may need their own space to do this. Staff might set the tone by talking about their own feelings or setting guidelines. It's important to listen to each other. Students may look to staff to learn how to react to situations. Tutors can show that strong feelings need not be overwhelming by 'modelling' genuinely felt emotions when breaking bad news, however they should be clear, direct and honest, stay calm and not panic. It is usually more helpful to use terms like 'died' and 'dead' rather the euphemisms for death, and to give facts and encourage questions. Staff should always present the facts however difficult these may be to accept. If the truth is hidden it can lead to rumours which can be inaccurate and unhelpful.

It can be helpful to talk about what is going to happen next because it helps to know what to expect and thus prepare for whatever may happen.

## **Traumatic incidents**

A traumatic incident presents particular issues but the guidelines here still apply. Often teachers underestimate what they can do and asking for specialist help too early can, in fact, leave staff feeling less able to cope, however it may be useful to work with other agencies on a consultation basis. The most important consideration may be whether a student wishes to have counselling or not.

## **Involvement with the funeral**

Any involvement of students in the funeral ceremony is, of course, a decision for the family. Funerals play an important part in helping to acknowledge the reality of the death and to face up to the pain of the loss. Individual religious beliefs should also be accepted and it may be appropriate to involve Ministers from the relevant bodies.

If the death affects such a significant part of the College community that it cannot be accommodated at the funeral, then it may be appropriate to hold a memorial service, a simple act of remembrance such as planting of a tree or writing of poems. Spontaneous ideas from students and staff may also emerge.

## **Meeting the needs of grieving students - some helpful advice**

- Present accurate information.
- Encourage involvement in daily activities.
- Have fears and anxieties addressed.
- Do not presume to know what the student is feeling.
- Offer reassurance.
- Offer opportunities to remember.
- Value feelings.
- Help when feelings become overwhelming.
- Continue to monitor individuals.
- In essence talking and listening are both key activities.
- Remember, do not impose on students and respect their need for privacy.
- Be vigilant in looking for opportunities for the student to share their feelings.

## **Ways of remembering - some helpful advice**

Remembering and commemoration are essential parts of the process of grieving, not just immediately but also in the longer term.

The following ideas may be useful, however, the best ideas may come from those who knew the person best:

- Set a special noticeboard for people to express feelings through drawings, letters or poems.
- Hold a special memorial service. Students can be involved in the choice of music, readings or stories told. The planning of such events can be as therapeutic as the event itself.
- The planting of a tree, placing of a bench or marking a particular spot in memory of that person.

## **Suicide**

### **The Suicide of a member of the College**

The act of suicide presents particular challenges to colleges. A suicide, especially by a young person, evokes strong feelings which may range through shame, guilt, anger particularly if there are concerns that it could have been prevented. A suicide is a tragic and deeply unsettling loss, however in many ways it is no different from any other type of death. However, the process of adaption may be complicated.

Death by suicide should be considered and managed no differently from other losses that affect college life and the guidelines previously suggested apply equally to death by suicide.

Particular attention should be given to attitudes of staff who may be talking through the circumstances with young people. It is important to gently challenge any beliefs that anybody was to blame or the death prevented.

### **Dealing with the media**

It is important that a senior member of staff, probably experienced in such matters, responds to any contact made by the media.

When specialised help may be needed

Indications for this might be, if a student:

- Appears anxious, is frequently crying, losing confidence or isolated from peers.
- Is unable to accept the reality of the loss, for instance, talking as if the dead person is still alive.
- Finds it difficult to talk about the dead person.
- Seems unable to overcome their grief.
- Is constantly unhappy and shows no sign of any enjoyment in activities previously enjoyed.
- Displays aggressive behaviour or has other behavioural problems.
- Blames him or herself for the death.
- Has poor attendance.
- Appears to lose self esteem

### **Sources of help**

There are a number of external agencies who are able to offer advice, assessment or counselling to any student who might require specialist help. These are detailed on the College's Early Help offer on the website. College can also signpost to:

- College Counsellor
- National Health Service. Within the Health Service, General Practitioners, Clinical Psychologists, Psychiatrists and Psychiatric Nurses can provide counselling and family support.
- Hospices often provide services to the bereaved.
- Social Services.

Working together and ensuring good communication is essential for effective joint working.

### **Support for Staff**

Dealing with grief is emotionally demanding. There is often a strong desire to try and make things better. However, working with grief is not about taking the pain away but believing that working through the emotions of grief is the way to adapt to the loss. However, helping students who are dealing with these emotions will place stress on the staff in the following ways:

- They may well be grieving themselves, especially if they knew the deceased.
- The loss may reawaken previous losses or bereavement.
- They may not feel comfortable with talking about emotions.
- The emotional demands are stressful and, in themselves, may be sufficient for staff to need support. However, if they coincide with other difficulties, staff may feel overburdened.
- If staff are managing a situation they may not give full attention to their own needs and feelings.
- There may be a strong identification with the student or family.

Staff often find it difficult to ask for extra support for themselves. Some fear it may be perceived as a sign of weakness or inability to cope. Support should be offered as a matter of course for all those dealing with bereavement. Start by asking people what they think they need for themselves.

It is important to watch for any tell-tale signs. The College counsellor should be available for staff to access. It is useful to recognise and acknowledge the difficulties of working with bereavement and to ensure staff look after their own needs and do not feel guilty about continuing to lead their own lives.

One of the most effective ways of helping is taking time to talk things through as much as possible with individuals and in staff groups. Other strategies may include a staff session on stress management techniques or bringing people experienced in working in this area to talk about coping strategies. Staff will benefit from feeling that their needs are being heard and understood.

### **Multi-Cultural Issues**

Issues of ethnic and cultural identity are extremely important to consider in bereavement. The grieving process is largely determined by family, community, race and culture, which will also include both spiritual values and beliefs. The following needs to be considered:

- Do not be afraid to admit you may not know or fully understand the values and customs of other communities. It can be helpful to say you do not know and to ask for help. Useful

questions can be; “Am I understanding you correctly?” “Can you tell me if I say the wrong things?” “Is there anything that it would be useful for me to know?” and so on.

- Find out what the rituals and customs are immediately following the death.
- Avoid ‘colour blindness’, that is, ignoring the differences in customs and beliefs of different cultures.
- Distress and upset is shown in different cultures in different ways. For instance, in some cultures, mind and body are seen as indivisible and distress may be expressed through physical symptoms.

Some ethnic minority groups in society do not always get equal access to services and therefore to all the help they may need. Any member of staff involved should advise the family that help is available from external agencies.

**RISK ASSESSMENT FOR VISITORS AND OTHERS WHO ARE NOT EMPLOYEES OF THE COLLEGE AND WHO WILL NOT CARRY OUT REGULATED ACTIVITY\***

**(TO BE COMPLETED AND RETURNED TO VISITOR RECEPTION IN ADVANCE OF VISITS OR APPOINTMENTS)**

**Name of Visitor(s) and Organisation:** .....

**Name of College Contact:** .....

**Department:** ..... **Workplace Area:** .....

Assessment	
<b>1</b>	<b>Is the visitor in College for contact which is frequent and/or intensive and gives the person the opportunity, in carrying out their work, to have contact with children?</b> YES/NO  If YES – complete V2 instead: Volunteer & Worker Form (Frequent contact)
<b>2</b>	<b>Is the visitor coming into College as a guest speaker to students? YES/NO</b> If YES please send a copy of the External Speaker Declaration to the guest speaker to complete and return. Complete risk assessment overleaf and pass <b>all</b> paperwork to Graham Williams for approval <b>at least one week in advance</b> .
<b>3</b>	<b>Date</b>
<b>4</b>	<b>Time</b>
<b>5</b>	<b>Reason for visit</b>   Student Services use only: Employer: <input type="checkbox"/> University: <input type="checkbox"/> Other: Please state .....
<b>6</b>	<b>Duration</b>
<b>7</b>	<b>Does the visitor have any special requirements or disabilities that require specific arrangements to be made?</b>
<b>8</b>	<b>Who will supervise?</b>
<b>9</b>	<b>Nature of supervision</b>

**\*Activity is 'Regulated Activity' in relation to children when:**

- carried out frequently (once a week or more), or on 4 or more days in a 30 day period
- carried out by the same person engaging in work for, or in connection with, the purposes of the College; and
- it gives the person the opportunity, in carrying out their work, to have contact with children

**Name:** ..... **Date:** .....

**Signed:** ..... (Person responsible for visit)

**PLEASE COMPLETE AND RETURN THIS FORM TO VISITOR RECEPTION (EITHER A HARD COPY OR ELECTRONICALLY) IN ADVANCE OF VISITS OR APPOINTMENTS**

## SAFEGUARDING RISK ASSESSMENT FOR GUEST SPEAKERS VISITING COLLEGE

Potential Hazards and Identification of Risk (Event/Group Members)	Control Measures	Residual Risk Rating Acceptable/Unacceptable
1. Guest speaker could say something inappropriate to students.	i. External Speaker Declaration will be completed before the visitor speaks to students.  ii. Member of staff will be present at all times to ensure this does not happen: YES/NO (please circle)	Acceptable
2.		

<b>IS YOUR VISITING SPEAKER'S INPUT CAREERS-RELATED?</b> If yes, you must now complete the electronic Gatsby Benchmark form. The form can be found via Staff Portal → Useful Links → Gatsby Benchmark. Thank you.	<b>YES/NO</b>
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**Please pass to Graham Williams together with the completed External Speaker Declaration (if already completed).**

**Signed:** .....  
 Graham Williams, Designated Safeguarding Lead

**Date:** .....

## External Speaker Declaration

Worcester Sixth Form College has both a legal and moral responsibility to ensure that our students are not exposed to views that conflict or undermine fundamental British values including those which might incite others to unlawfully discriminate against racial or gender groups or encourage students to commit acts of violence.

For these reasons we ask that you read the statements below and sign the declaration at the bottom of this page. All visiting speakers to the College are asked to complete this declaration and we trust that you understand and accept that we are acting in the best interests of our students and that we are not making any kind of unfavourable judgement about visiting speakers or their views and opinions.

Please read the declaration below. Please indicate your response to each statement and sign at the bottom.

1. I confirm that I will not incite an audience to violence, breach of the peace or racial hatred, and I understand that such words or actions are contrary to public order laws and as such will not be regarded as lawful speech.

Yes/No

2. I confirm that I will respect the rights and freedom of others as protected by the law (for example, I must not make statements which are actionable for defamation). I will respect the freedom of speech of others and will ensure that no groups face unlawful discrimination as a result of my words or actions.

Yes/No

3. I confirm my support for fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. I fully understand that freedom of speech does not extend to individuals or organisations not committed to these values.

Yes/No

Signed: .....

Name: .....

Date: .....

## SAFEGUARDING EMERGENCY CONTACTS

If there is a concern regarding the safety of a student and the Safeguarding Team and SLT are unavailable, please consider the following...

If it is an emergency where you feel a student is in imminent danger call...	Police      999
If you feel there is a risk to a student in a family situation call... You could ask them to carry out a 'safe and well' check	West Mercia Police      101 (non-emergency 24 hour)
<b>Worcestershire Safeguarding Support Services</b>  <b>Ofsted</b>	Gem Rainsford-Grady (Business Support Officer) Tel: 01905 845526 Email: GGrady@worcestershire.gov.uk 0300 123 1231
If you think a referral to Children's Services Social Care is needed call - <b>Family Front Door (Children's Social Care)</b>  To submit an online Cause for Concern notification log onto:  <a href="http://www.worcestershire.gov.uk/childrensocialcare">http://www.worcestershire.gov.uk/childrensocialcare</a>	<ul style="list-style-type: none"> <li>• <b>01905 822666</b> Weekdays 9.00 to 17.00 (Fridays 16.30)</li> <li>• <b>01905 768020</b> (evenings and weekends)</li> </ul>
If you have an urgent concern relating to <b>PREVENT</b>  <a href="#">Worcestershire referral process</a>	Paul Kinsella, <a href="mailto:pkinsella@worcestershire.gov.uk">pkinsella@worcestershire.gov.uk</a> Tel: 01905 846550
If you need to contact a LADO  For advice & guidance contact Denise Hannibal <a href="mailto:dhannibal@worcestershire.gov.uk">dhannibal@worcestershire.gov.uk</a>  Tel No: 01905844436    Mobile: 07825531295	<b>Local Authority Designated Officer</b>  Tel: 01905 846221 <a href="mailto:LADO@worcestershire.gov.uk">LADO@worcestershire.gov.uk</a>

Remember it is always better to consult, even if in the end it is agreed nothing needs doing, than to hold information and do nothing with it.