

Safeguarding and Child Protection Policy and Procedure

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Safeguarding Link Governor	Jennette Arnold	01432 379351
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	MASH (Multi Agency Safeguarding Hub) for reporting concerns	01432 260800
	Herefordshire Safeguarding	01432 260100
	Children Board	01432 261628
	Family Assessment and Safeguarding Team; Out of hours	01905 768020

Key Terms used in this policy	Acronym
Designated Safeguarding Lead	DSL
Deputy Designated Safeguarding Lead	DDSL
Safeguarding and Prevent Manager	S&P Manager
Keeping Children Safe in Education	KCSIE
Child in Need	CIN
Child Looked After (formally LAC Looked After Child)	CLA
MyConcern (internal digital platform to record safeguarding information)	MC
Local Authority Designated Officer (for safeguarding)	LADO
Personal Education Plan	PEP
Educational Health and Care Plan	EHCP
Obsessive Compulsive Disorder	OCD
Autism Spectrum Disorder to include Asperger's syndrome	ASD
Attention Deficit Hyperactive Disorder	ADHD
Pathological Demand Avoidance	PDA
Emotionally Based School Avoidance	EBSA
School Avoidance Disorder	SAD

Not in Education or Training	NEET
Single Central Record	SCR
Disclosure and Barring Service	DBA
Multi Agency Safeguarding Hub	MASH
Child and Adolescent Mental Health Services.	CAMHS
NHS Wellbeing and Emotional Health in Schools	WEST
Cognitive Behaviour Therapy	CBT
Pupil Referral Unit	PRU

1. Introduction

- 1.1 Safeguarding children and adults is everyone's responsibility. This policy sets out the roles and responsibilities of Hereford College of Arts in working together with other professionals and agencies to safeguard young students and vulnerable adults.
- a) "Young students" refers to "children and young people". This term is used to mean "those under the age of 18".
 - b) A vulnerable adult is a person aged 18 and above unable to adequately safeguard themselves from abuse, neglect, exploitation, coercion, or self-neglect
 - c) To aid the understanding of the use of the word vulnerable within this policy, see the definition found in point 3.2.
- 1.2 The policy promotes students' welfare and safeguards them from abuse, neglect and radicalisation.

2. Aims

- 2.1 Hereford College of Arts is committed to:
- a) Ensuring that it maintains the highest possible standards to meet its social, moral and legal responsibilities in safeguarding the wellbeing of children, young people and adults in a vulnerable situation within its capacity as an education provider.
 - b) Improving and promoting best practice throughout the college ensuring that the wellbeing of students is safeguarded and that they are protected from harm. This will, in turn, promote opportunities for students to thrive and benefit from their learning experience, and foster a culture where students are valued and their right to be safe is respected.
 - c) Maximising young people's and adult students' resilience, choice, control and inclusion and protecting their human rights.
 - d) Nurturing a culture of listening to students and taking account of their wishes and feelings, both in individual decisions and the development of support as appropriate
 - e) Working in partnership with other external organisations to safeguard susceptible and at-risk students, including referring concerns to the relevant safeguarding board, Social Services, the Police or in cases of radicalisation, to Prevent.
 - f) Ensuring safe, compliant and effective working practices are in place to protect the welfare of students.
 - g) Supporting staff within the organisation to embrace best practice in taking responsibility for safeguarding.

3. Scope

- 3.1 In line with the law, this policy defines a child as anyone under the age of 18 years.
- 3.2 To aid the understanding of the use of the word “vulnerable” within this policy, see the following definitions below from guidance from the [Vulnerabilities: applying All Our Health - GOV.UK](#)
- a) Vulnerability:
- Being vulnerable is defined as in need of special care, support, or protection because of age, disability, risk of abuse or neglect.
- b) Childhood vulnerability:
- There is no commonly used definition of childhood vulnerability. A child can be vulnerable to risks and poor outcomes due to individual characteristics, the impact of action or inaction by other people and their physical and social environment.
- c) Vulnerable adults:
- The NHS defines vulnerable adults as any adult (person over the age of 18) unable to take care of themselves or protect themselves from exploitation.
 - Many factors can influence adult vulnerability, experiences of vulnerability in childhood may negatively impact adults in later life – particularly if someone has fewer protective factors in place, such as a supportive family or a stable household income.
- d) Vulnerable background:
- Children and young people’s physical, emotional and mental wellbeing are significantly shaped by the social determinants of health into which they are born, live, learn and grow. Traumatic events and adverse circumstances occurring in childhood are associated with long-term impact on outcomes at population level. This does not mean that every child experiencing trauma and adversity will experience poorer outcomes. Multiple factors influence outcomes – the presence of protective factors such as a supportive family will also be key influences.
- 3.3 Ultimate responsibility for young people under the age of 18 lies with parents, carers or those with parental responsibility.
- a) Parents and carers will be sent advice on Safeguarding and Health and Safety issues should new guidance be released, for example; advice about how to stay safe in extreme weather conditions or on a specific educational visit.
- 3.4 This policy applies to all staff (permanent, short course, temporary, sessional or volunteers), governors and students as well as all people who work on behalf of Hereford College of Arts and visitors.

4. The Legal Framework

- 4.1 Hereford College of Arts has a statutory and moral duty to ensure that the college functions with a view to safeguarding and promoting the welfare of children and young people and adults “at risk” receiving education and training at the college.
- 4.2 Under section 10 of the [Children Act 2004](#), all maintained schools, Further Education colleges and independent schools, including free schools and academies, are required to cooperate with the Local Authority to improve the wellbeing of children in the local authority area.
- 4.3 Under section 14B of the [Children Act 2004](#), the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.
- 4.4 This policy and the accompanying procedures have been developed in accordance with the following statutory guidance and local safeguarding procedures:
- [Working together to safeguard children 2026](#)
 - [Keeping children safe in education 2026: September 2026](#)
 - [Professional Curiosity Learning Briefing](#)
<https://www.herefordshiresafeguardingboards.org.uk/documents/professional-curiosity-learning-briefing-february-2023>
 - [Children's Policies & Guidance - Herefordshire Safeguarding Boards and Partnerships](#)
<https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance>
 - [Child Sexual Exploitation: Definition and Guide for Practitioners February 2017](#)
<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>
 - [Multi-agency Referral: Reporting concerns \(MARF\)](#)
<https://westmids.trixonline.co.uk/?b=Herefordshire>
 - [Prevent duty guidance: England and Wales \(2023\) Updated March 2024](#) <https://www.gov.uk/government/publications/prevent-duty-guidance>
 - [Multi- Agency Statutory Guidance on Female Genital Mutilation April 2016](#) <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>
[Updated July 2020](#)
 - [Research and analysis overview: Review of sexual abuse in schools and colleges](#)
<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>

- [Information Sharing Advice for Practitioners – May 2024](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- [Children’s Act 2004](http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_2004031_en.pdf)
http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_2004031_en.pdf
- [What to do if you are worried about a Child is being abused](https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2)
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview)
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

4.5 This policy and procedures cannot cover all eventualities. The major aim is to encourage a consistent approach and a standard of good practice. They cannot take the place of supervision and they must be used in conjunction with professional judgement and vigilant practice (in this context, safeguarding supervision ensures that safeguarding young people is effective, safe and follows procedures. Supervision meetings help staff manage the often-complicated feelings that arise or sometimes distort the way in which we respond to incidents and concerns. Clinical supervision has been common practice in other sectors for a long time, it is best practice that all DSL’s are offered professional supervision to help them in their role). In this policy, abuse and neglect are defined as forms of maltreatment to any student. This may be made by omission or commission i.e. inflicting harm or failing to prevent harm.

5. Roles and Responsibilities

- 5.1 The SLT member who has lead responsibility for safeguarding is the Designated Safeguarding Lead (DSL). The DSL has a key duty to take lead responsibility for raising awareness with the staff of issues relating to the welfare of young people and adults and the promotion of a safe environment for all students within the college. The role of the DSL is supported by the Deputy Designated Safeguarding Leads (DDSLs). Responsibilities for both these roles are described in Appendix A.
- 5.2 The governing body has a Designated Governor with special responsibility for safeguarding issues. This role is also described in Appendix A. The designated governor is responsible for liaising with the principal and vice principal FE/HE over matters regarding safeguarding young people and adults in a vulnerable situation.
- 5.3 The case manager for dealing with allegations of abuse made against members of staff of the college is the principal. The case manager for dealing with allegations

against the principal is the Chair of Governors. The procedure for managing allegations is detailed in Appendix D.

- 5.4 The principal will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficiently resourced, and that updated training and time are allocated to enable staff members to discharge their safeguarding responsibilities.
- 5.5 The governing body is committed to ensuring that the college meets the seven aims stated in section 2.1. In pursuit of these aims, the governing body approve and annually review the Safeguarding and Child Protection Policy and Procedures with the aim of:
- a) Raising awareness of issues relating to the welfare of young people and adults and the promotion of a safe environment for all students.
 - b) Protecting young people and adults who have been identified to be at risk of significant harm, or radicalisation. Providing procedures for reporting concerns, and dealing with allegations of abuse to include allegations made against members of staff.
 - c) Ensuring the safe recruitment of staff. Volunteers, if undertaking regulated activity, require enhanced DBS and barred list checks. In developing the policy and procedures, the governing body takes account of guidance issued by the Department for Education and other relevant bodies and groups such as the Herefordshire Safeguarding Board.
- 5.6 The governing body receive an annual report from the designated senior member of staff with lead responsibility for safeguarding which will review how the duties have been discharged. The vice principal FE/HE should inform the Senior Leadership Team of any significant issues as necessary.
- 5.7 It is the responsibility of ALL staff to make themselves aware of this document and to be able to implement it as part of the college procedures. Recognition of actual or suspected abuse in any form is the responsibility of ALL staff.
- 5.8 ALL staff must;
- a) Familiarise themselves with and follow the college's Safeguarding and Child Protection Policy and Procedures at all times and implement procedures where appropriate.
 - b) Participate in safeguarding training and maintain current working knowledge in line with the Herefordshire Safeguarding Board and complete any SMARTLOG training related to Safeguarding. All staff must read PART 1 of Keeping Children Safe in Education (KCSIE) in full.
- One of the new areas of KCSIE for 2026 is related to students who are gender questioning. New guidance reflects DfE expectations around supporting gender questioning children, including parental involvement in most cases, at HCA we will log all students who are gender questioning on

MyConcern and review before making an assessment about parental contact.

- c) Contribute to actions required, including accurate and factual record keeping and information sharing in line with *Data Protection Act – 2018, Updated August 2020*, following the procedure for reporting safeguarding issues using MyConcern (see Appendix C).
- d) Work collaboratively with other agencies to safeguard and protect the welfare of students who use these services, and attend meetings both statutory and non-statutory where required.
- e) Remain alert at all times to the possibility of all forms of abuse or radicalisation.
- f) Maximise opportunities to embed safe practice/safeguarding across the curriculum.
- g) Ensure students are aware of where to seek support in the event of abuse, suspected abuse or radicalisation.

6. Safeguarding Protection Procedures

- 6.1 Dealing with Disclosure of Abuse. On learning of an allegation from a young person or adult “at risk” that abuse has or may have occurred, college staff should adopt the procedure detailed in Appendix C, with particular reference to the process in reporting and recording a disclosure (Appendix C).
- 6.2 In conjunction with college procedures, it is expected that all staff will follow the policy and procedures according to Herefordshire Safeguarding Children Board (HSCB) and National, regional and local policies, procedures and guidance for West Midlands Safeguarding Children Group (WMSCG)
 - a) [Home Page - Herefordshire Safeguarding Boards and Partnerships](#)
 - b) [West Midlands Safeguarding Children Group \(procedures.org.uk\)](#)
- 6.3 In respect of safeguarding individuals from radicalisation, the college works to the Prevent element of the Government’s Counter Terrorism Strategy, and, where deemed appropriate, will seek external support for students through referrals to Prevent. Prevent aims to work with the individuals to address their specific vulnerabilities, and prevent them becoming further radicalised
<http://www.preventforfeandtraining.org.uk/>.
- 6.4 Any member of staff who receives a disclosure of abuse or radicalisation, or has reasonable concern to believe that abuse or radicalisation has taken/may take place, must immediately inform the DSL/DDSL/Safeguarding & Prevent Manager. In such a circumstance where they suspect that the DSL or DDSL/Safeguarding & Prevent Manager is implicated, the principal should be consulted first. See Appendix C for Safeguarding Procedures.

6.5 Details of ALL suspected safeguarding issues and disclosures should be recorded on MyConcern. Information recorded should be factual, accurate, first hand and updated with file notes and actions by ALL those who are dealing with the issue. Relevant documents relating to the concern should also be uploaded to MyConcern.

6.6 In line with the procedures, the relevant safeguarding board (MASH/Multi- Agency Safeguarding Hub) will be notified as soon as there is a significant concern (Level 3 and Level 4 referrals). In the case of suspected radicalization, Prevent will be notified through the West Midlands Counter Terrorism Unit.

7. Students with Special Educational Needs and Disabilities (SEND)

7.1 The college recognizes that children with special educational needs and disabilities can face additional safeguarding challenges. These additional barriers can include:

- a) Assumptions that indicators of possible abuse such as behaviour, mood, injury and presentation relate to the child's disability without further exploration;
- b) The potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any sign;
- c) Communication barriers and difficulties in overcoming these barriers.

7.2 The college will endeavour to provide bespoke and appropriate safeguarding training for staff that will allow them to make reasonable adjustments to ensure students with SEND are kept safe.

7.3 The college will ensure that safeguarding information and resources are accessible to all students with SEND through a variety of different methods.

8. Students – Criminal Convictions

8.1 The college recognises that before application, or during their studies, a student may be subject to a criminal investigation and or charged with a criminal offence.

8.2 The college requires new applicants to declare any relevant convictions, cautions or pending criminal investigations. Where a student is charged with a criminal offence during their studies, they must inform the college immediately; any information provided will be treated in line with the Data Protection Act 2018.

8.3 Where a criminal conviction is disclosed that indicates a student may pose a risk to fellow students or those who work in the college, the college has the right to deny admission or continuation to a student. Relevant offences would be:

- a) Sexual offences to include those listed in the Sexual Offences Act 2003
- b) Offences including firearms
- c) Offences including terrorism
- d) Offences relating to hate crime

- e) Offences including violent attacks or the intention to harm that resulted in actual bodily harm
 - f) Harassment and Stalking
- 8.4 With any criminal disclosure or significant safeguarding incident that relates to a potential or current student, the college will assess the risk relating to the incident or conviction. The relevant vice principal FE or HE together with the principal, will make the final decision as to the student's admission or continuation at the college. This will be based primarily on the risk assessment together with other relevant information from other agencies or staff.

9. Policy Review

- 9.1 This policy and the procedures will be reviewed annually by the Designated Safeguarding Lead, approved by the Board of Governors. The review should include (where relevant) consultation with staff. An annual report on Safeguarding is produced for the governing body by the Designated Safeguarding Lead and in consultation with the Higher-Level Safeguarding Group.

10. Linked Policies and Procedures

- 10.1 The following college policies and procedures linked with this policy will include:
- a) Admissions Policy
 - b) Bullying Harassment and Sexual Misconduct Policy
 - c) Disciplinary Procedures for Senior Post-Holders
 - d) Educational Visits Policy and risk assessments
 - e) E-safety Policy
 - f) Equality, Diversity and Inclusion Policy
 - g) Support for Study Policy
 - h) Health and Safety Policy and other linked policies
 - i) IT Acceptable Use Policy
 - j) Child on Child Abuse Policy
 - k) FE Support and Challenge Policy
 - l) Low Level Concerns Policy
 - m) Drugs Policy
 - n) Staff code of Conduct and Professional Behaviour
 - o) Recruitment, Selection and Appointment of Staff Policy
 - p) Staff Disciplinary Procedure
 - q) Student Complaints Policy and Procedure
 - r) Suicide Awareness, Intervention and Response Policy

s) Whistleblowing Policy and Procedure

Appendix A: Staff Roles in Safeguarding

1. The role of the SLT member of staff with Lead Responsibility

1.1 The Designated Safeguarding Lead is responsible for:

- a) Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the relevant investigating agencies as agreed within the Herefordshire Safeguarding framework or other appropriate agencies (such as the Police, Channel) as appropriate.
- b) Providing advice and support to other staff on issues relating to safeguarding children/young people/ adults “at risk”.
- c) Maintaining a proper record of any safeguarding or radicalisation referral, complaint or concern (even where that concern does not lead to a referral).
- d) Ensuring that all staff, parents, guardians, carers within the college are aware of the college’s Safeguarding and Child Protection Policy and Procedure.
- e) Liaising with the Children’s and Adult Social Care Teams, the Herefordshire Safeguarding Board via MASH, the Police, Channel and other appropriate agencies.
- f) Liaising with employers and training organisations that receive young people or adults from the college on placements to ensure that appropriate safeguards are put in place.
- g) Ensuring that staff receive basic safeguarding awareness training, followed by training as appropriate to their role and training in radicalisation and extremism, and are aware of the college safeguarding procedures.
- h) Providing an annual report to the governing board of the college setting out how the college has discharged its duties.
- i) Reporting deficiencies in procedure or policy identified by the Herefordshire Safeguarding Partnership (or others) to the governing board at the earliest opportunity.
- j) They have received training in safeguarding issues and inter-agency working, as required by the Herefordshire Safeguarding Board, and will receive refresher training at least every 2 years. They should keep up to date with developments in safeguarding issues.
- k) The Designated Safeguarding Lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#)
 - https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf

2. The Role of the Deputy Designated Safeguarding Leads

2.1 The other designated members of staff with responsibility for young people and adult protection issues are the Deputy Designated Safeguarding Leads. These designated staff members report to the senior member of staff with lead responsibility and:

- a) Know how to make an appropriate referral; using the procedures.
- b) Are available to provide advice and support to other staff on issues relating to safeguarding young people and adults “at risk”, including at risk of radicalisation.
- c) Have particular responsibility to be available to listen to young people and vulnerable adults whilst studying at the college.
- d) Will deal with individual cases, including attending case conferences and review meetings as appropriate; liaises with other members of staff to undertake assessments under the Early Help processes.
- e) Have received training in safeguarding issues and inter-agency working, as required by the Herefordshire Safeguarding Board, and will receive refresher training as required.

3. The Role of the Designated Governor

3.1 The governor with designated responsibility for safeguarding is communicated to all staff and students and published on the college website. The designated governor is responsible for liaising with the principal and vice principal FE/HE over matters regarding safeguarding young people and adults, including:

- a) Ensuring that the college has procedures and policies which are consistent with the Herefordshire Safeguarding Board procedures ensuring that the governing board considers the college policy on safeguarding each academic year.
- b) Ensuring that each academic year the governing board is informed of how the college and its staff have complied with the policy.
- c) Is aware of cases that have been escalated and outcomes. For example, if the principal is dealing with an allegation against a staff member
- d) The Designated Governor is responsible for overseeing the liaison between appropriate agencies such as the Police, Social Services (as defined by Herefordshire Safeguarding Board) in the event of any allegation against the principal or the Senior Staff Member with Lead Responsibility. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

4. Multi-agency working

- 4.1 The college has a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the college contributes to multi-agency working in line with statutory guidance [Working together to safeguard children](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2) (<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>).
- 4.2 Locally, the three safeguarding partners (the local authority; an Integrated Care Board for an area within the local authority; and the chief officer of police for a police area in the Local Authority area) should work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- 4.3 The three safeguarding partners will set out in their published arrangements, which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the new arrangements. A list of relevant agencies is available at: [legislation.gov.uk](https://www.legislation.gov.uk) (<https://www.legislation.gov.uk/ukxi/2018/789/schedule/made>)

5. Information Sharing

- 5.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect. The college recognises this and acknowledges the importance of sharing between practitioners and local agencies where a safeguarding issue is evident or suspected. Arrangements should be in place that set out clearly the process and principles for sharing information within the college and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- 5.2 College staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people. The college recognises it is obliged to share information fairly and lawfully and – within the parameters of the Data Protection Act 2018 and GDPR – not prevent the sharing of information for the purposes of keeping children safe.
- 5.3 Further details on information sharing can be found at:
- a) <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
 - b) Local guidance on information sharing: [Herefordshire MASH Guidance Information Sharing May 2023](#)
 - <https://www.herefordshiresafeguardingboards.org.uk/documents/herefordshire-mash-guidance-information-sharing-may-2023#%3A%7E%3Atext%3DThere%20are%20no%20barriers%20to%20Crisk%20of%20abuse%20or%20neglect>

Appendix B: Safeguarding Definitions

1. General Definitions

1.1 Abuse

- a) Is behaviour towards a person that either deliberately or unknowingly causes a person harm or endangers their life or their civil rights. It can be passive. For example, failing to take care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be one-off or something that is repeated.

1.2 A vulnerable adult

- b) Is defined as an adult aged 18 years and over who is at risk of harm abuse, neglect and unable to protect themselves against exploitation due to their emotional and/or physical care and support needs. (Source: Herefordshire Safeguarding Adults Board.)

1.3 Children

- a) Are any people who have not yet reached their 18th birthday; a 16- year-old, whether living independently, in Further Education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger.

1.4 Child protection

- a) Is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm.

1.5 Early Help

- a) Means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years. Where a child would benefit from coordinated Early Help, an Early Help inter-agency assessment should be arranged. Chapter one of "Working Together to Safeguard Children" provides detailed guidance on the early help process.
- b) KCSIE 2026 has increased the focus on Family Help / Early Help. Guidance aligns more closely with Working Together to Safeguard Children, emphasising earlier identification of need and timely referrals for family support.

1.6 Harm

- a) Is ill-treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill-treatment of another.

1.7 Safeguarding children

- a) Is the action the college take to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of

children is defined in [Working together to safeguard children](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2) (<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>) as:

- Protecting children from maltreatment.
- Preventing impairment of children's health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes

1.8 **Significant harm**

- a) Is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states "where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child."

2. **Categories of the types of abuse**

- 2.1 All school and college staff should be aware that abuse, neglect and serious violence and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

2.2 **Child Abuse:**

- a) A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

- 2.3 **Emotional or psychological abuse** (may also include the use of text, social media networks and email).

- a) This may involve:
- The persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
 - Conveying to children that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.
 - Not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate.
 - Age or developmentally inappropriate expectations imposed on children. These may include interactions that are beyond the

child's developmental capability as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

- Seeing or hearing the ill treatment of another, e.g. domestic abuse.
 - Serious bullying (including cyberbullying), causing children frequently to feel frightened, or in danger.
 - Exploitation or corruption of children.
- b) Some level of emotional abuse is involved in all types of maltreatment of a child and young person, although it may occur alone. Emotional abuse covers obstructing a person's choices through the use of fear, intimidation and/or bribes, intentionally affecting independence and self-esteem. The environment may depict a pervasive atmosphere of deceit and distrust.
- c) Impaired performance and development may be a product of overdependence, and isolation may result from side effects of such an environment or prevent the adult from having access to helpful services.

2.4 **Neglect/act of omission**

- a) Involves the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development.
- b) May occur during pregnancy as a result of maternal substance misuse/abuse.
- c) May include failing to provide adequate food, clothing or shelter, (including exclusion from home or abandonment) or failing to protect from physical and emotional harm or danger.
- d) May include failing to ensure adequate supervision, (including the use of inadequate care givers) or access to appropriate medical care or treatment.
- e) May also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- f) This includes both the physical and emotional neglect/acts of omission. It concerns a failure to keep an individual clean and warm, and to promote optimum health. This could also include giving the improper quantity of medication or distributing the wrong medicine(s). Neglect can be as simple as giving a person inadequate nutrition and preventing them from making independent choices. A person may choose to self-neglect, and while it may be a symptom of a form of abuse, it is not abuse itself within the definition of these procedures.

2.5 **Discriminatory abuse**

- a) This may focus on the perceived vulnerability of an adult in the form of prejudice or sexism or solely on the basis of targeting an adult's disability. Discriminatory abuse can take the form of any of the other forms of abuse,

harassment, verbal abuse or similar mistreatment. Discriminatory abuse can include serious, pervasive or repeated discrimination, which may lead to diminishing opportunities, significant harm or exclusion, provision of poor standards of care, or a failure to protect or provide redress through the criminal or civil justice system. KCSIE 2026 has new and updated guidance on faith based prejudice, racism and other forms of discrimination

2.6 **Physical abuse**

- a) Physical abuse covers physical injuries which have no satisfactory explanation, or where there is a definitive knowledge, or a reasonable suspicion, that the injury was inflicted with intent, or through lack of care, by the person having custody, charge or care of that person. This may involve hitting, shaking, throwing, poisoning, burning, 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.

2.7 **Adult abuse**

- a) Adult abuse is defined as; “a violation of an individual’s human and civil rights by any other person or persons which may result in significant harm. When something is said or done to an adult who cannot protect him or herself, and when this leaves the person harmed, upset and frightened. It is abuse whether or not it is unintentional.” Source: Herefordshire Safeguarding Board.

2.8 **Child Sexual abuse**

- a) Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, not involving a high level of violence, whether or not the child is aware of what is happening. Activities may involve physical contact, including assault by penetrative acts of any part of the body, (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing.
- b) They may include non-contact activities, such as involving children looking at or in the production of sexual 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).
- c) Sexual abuse is not solely perpetrated by men. Women can also commit acts of sexual abuse as can children.
- d) Force and coercion are signatures of sexual abuse. Forced sexual acts which might be abusive include: non-contact abuse such as looking at pornographic images, harassment, indecent exposure, innuendo or teasing; or physical contact, such as masturbation, touching breasts, genitalia or anus, penetration or attempted penetration of vagina, anus or mouth.

2.9 **Sexual Exploitation** is also sexual abuse;

- a) It involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.
- b) Sexual Trafficking is a form of slavery, and involuntary servitude resulting in grave human rights violations. Sex trafficking involves individuals profiting from the sexual exploitation of others and has severe physical and psychological consequences for its victims.
- c) The Child Sexual Exploitation Guide February 2017 provides the following definition of child sexual exploitation; “Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”
- d) Like all forms of child sexual abuse, child sexual exploitation:
 - Can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex;
 - Can still be abuse even if the sexual activity appears consensual;
 - Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
 - Can take place in person or via technology, or a combination of both;
 - Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
 - May occur without the child or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
 - Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
 - Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors

including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

- e) Puppet on a String (Barnados 2011) identifies three different models of activity, based upon the research they have done into exploitation, which are often hidden:
- Inappropriate relationships: usually involving one perpetrator who has inappropriate power or control over a young person (physical, emotional or financial). One indicator may be a significant age gap. The young person may believe they are in a loving relationship.
 - Boyfriend model of exploitation and peer exploitation: the perpetrator befriends and grooms a young person into a “relationship” and then coerces or forces them to have sex with friends or associates. Sometimes this can be associated with gang activity but not always.
 - Organised/networked sexual exploitation or trafficking: young people (often connected) are passed through networks, possibly over geographical distances, between towns and cities where they may be forced/coerced into sexual activity with multiple men. Often this occurs at “sex parties” and young people who are involved may be used as agents to recruit others into the network. Some of this activity is described as serious organized crime and can involve the organised “buying and selling” of young people by perpetrators.
- f) It is important to recognise that these are not exhaustive but show a spectrum of exploitation.
- g) Strategic principles:
- Child Sexual Exploitation (CSE) is a form of child abuse which can involve the sexual, physical and emotional abuse of children as well as neglect.
 - Children do not make informed choices to enter into or remain within sexually exploitative situations, as they do so via coercion, manipulation, grooming and/or other forms of enticement.
 - Children under 16 years cannot consent to sexual activity with an adult, and sexual activity with a child aged less than 13 years is statutory rape.
 - Children who are sexually exploited will experience difficulty and/or confusion around their autonomy to make choices, and their understanding around sex, sexuality and the sexual activity into which they have been coerced.
 - Sexually exploited children must be treated as victims of child abuse, and not as offenders.

- Law enforcement efforts must involve disruption or sexually exploitative activity, and target offenders as sexual abusers, who may be adult, but could also be the child's peers and/or other young people.
- h) Refer to HSCB's Child Sexual Exploitation webpage [Child Exploitation - Herefordshire Safeguarding Boards and Partnerships](#) and use the tools and pathways for [Herefordshire Children's Policies & Guidance – Herefordshire Safeguarding Boards and Partnerships](#)
- <https://www.herefordshiresafeguardingboards.org.uk/safeguarding-information/safeguarding-%20children-information/child-exploitation>
 - <https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-%20guidance>

2.10 **Domestic abuse, Sexual Violence and stalking**

a) The Home Office defines domestic abuse as:

- “Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:
 - psychological
 - physical
 - sexual
 - financial
 - emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.”

b) The college acknowledges that the experience/witnessing of domestic abuse, sexual abuse, harassment and/or stalking may have a negative impact on students' studies and learning therefore the college is committed to:

- Providing a safe and non-judgemental environment within which students feel able to make a disclosure.

- Disclosures will be recorded accurately and relevant referrals made.
 - The college will treat the safety of the student experiencing the abuse as a high priority acting to minimise risk and maximise safety.
 - The college has a duty of care to all students. Where both students, or parties involved are on roll, procedures will be followed to safeguard and support all, including alleged perpetrator(s).
- c) KCSIE 2026 has placed a stronger emphasis on harmful sexual behaviour, harassment, violence, misogyny and Violence Against Women and Girls.

2.11 **Financial abuse**

- a) Financial abuse covers the inappropriate use of an individual's resources or funds by a third person. This includes the unsanctioned or inappropriate use of another's money to enter the adult "at risk" into financial contracts, or financial commitments to their disadvantage when the adult at risk may not understand. In cases involving potential abuse by people holding Lasting or Enduring Powers of Attorney, the Office of the Public Guardian should be informed. The growth of personalised budgets and self-funding suggests the need for extra vigilance in relation to financial abuse.
- b) All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to, bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should be clear as to the college's policy and procedures with regards to child-on-child abuse.

2.12 **Child-on-Child Abuse**

- a) Child-on-child abuse is considered to be any form of physical, emotional, sexual and financial abuse, and coercive control, between children and adults within or outside of a relationship (both intimate and non-intimate). See the college's Child-on-child Abuse Policy for college procedures.

2.13 **Upskirting**

- a) 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.
- "Upskirting" became a criminal offence under the Voyeurism (Offences) Act 2019.
 - "Upskirting" offenders can be arrested and face up to two years in prison.

2.14 **Contextual safeguarding**

- a) Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between young people outside of college. All staff, but especially the DSL (and deputies) should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. Assessments of young people should consider whether wider environmental factors are present in a young persons' life that are a threat to their safety and/or welfare. Additional information about contextual safeguarding can be found at <https://contextualsafeguarding.org.uk/>.

2.15 **Serious violence**

- a) All staff should be aware of indicators, which may signal that young people 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.
- b) 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. If involvement on violent crime is suspected this should be reported immediately to the DSL and the three safeguarding partners (the Local Authority; an Integrated Care Board for an area within the Local Authority; and the Chief Officer of Police for a Police area in the Local Authority area).

2.16 **Female Genital Mutilation** (FGM)

- a) FGM is the partial or complete removal of external female genitalia for a non-medical reason. FGM can also be other forced injury to female genitalia. (see Appendix E)

2.17 **Forced Marriage**

- a) Forced marriage occurs when a young person or adult is forced into marriage without their explicit consent.

- 2.18 There should be a clear boundary between incidents that are considered as abusive and those where the college's behavioural and disciplinary systems and policies should be applied.

Appendix C: Safeguarding Procedures

1. Specific Safeguarding Issues

- 1.1 College staff members need to be aware of specific safeguarding issues and be alert to any risks. Herefordshire Safeguarding Children Board, Levels of Need Threshold Guidance has detailed information about specific issues such as child sexual exploitation, fabricated or induced illness, female genital mutilation, private fostering, etc.
- 1.2 The Herefordshire Government website, [Protect someone – Herefordshire Council](https://www.herefordshire.gov.uk/social-care-and-support/protect-someone/) (<https://www.herefordshire.gov.uk/social-care-and-support/protect-someone/>) has broad government guidance on a variety of issues. The following is not a comprehensive list and staff should search the *Herefordshire Safeguarding Board* for advice on other issues:
 - a) Bullying, including cyberbullying.
 - b) Child sexual exploitation.
 - c) Drugs.
 - d) Fabricated or induced illness.
 - e) Faith abuse.
 - f) Female genital mutilation.
 - g) Gangs and youth violence.
 - h) Trafficking.
 - i) Radicalisation.

2. Recognition – What to look for

- 2.1 Staff members should refer to the detailed information about the categories of abuse and risk indicators in the Right Help Right Time Levels of Need Framework that can be found at: [Children's Policies & Guidance - Herefordshire Safeguarding Boards and Partnerships](#) for further information.
 - a) <https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance>
- 2.2 In an abusive relationship, the child may:
 - a) Appear frightened of their parent(s).
 - b) Act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups.
- 2.3 In an abusive relationship, the parent or carer may:

- a) Persistently avoid child health services and treatment of the child's illnesses.
 - b) Have unrealistic expectations of the child.
 - c) Frequently complain about/to the child and fail to provide attention or praise.
 - d) Be absent.
 - e) Be misusing substances.
 - f) Persistently refuse to allow access on home visits by professionals.
 - g) Be involved in domestic violence and abuse.
 - h) Be socially isolated.
- 2.4 Serious case reviews have found that if parental substance misuse, domestic abuse and mental health problems (sometimes referred to as the “toxic trio”), coexist in a family, it could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.
- 2.5 **KCSIE 2026 states** that children who are absent from education may be at increased risk of harm, therefore students’ attendance is tracked closely and referred to the Safeguarding and Prevent Manager at HCA.
- 3. Safeguarding Children Levels of Need Threshold Guidance**
- 3.1 The Safeguarding Children Levels of Need Threshold Guidance has been developed so that everyone working with children and young people or “adults at risk” has a common language for understanding the needs and risks surrounding children and their families.
- 3.2 For example, if the college has concerns about a child and needs advice or support from a Duty and Assessment Social Worker, they will use the document as a guide to understand the school’s concerns and provide advice about what to do or to decide whether the child and family need Social Care involvement. The Levels of Need guidance does not replace professional judgement, but it is intended to support decision- making and discussions between services and practitioners.
- 3.3 It is important that staff members are familiar with the Levels of Need Guidance tool. It shows levels of need (see below) and an indicator tool describing a range of conditions about the child and family that the college (and other practitioners the college has discussions with) can use to identify their level of need.
- 3.4 The Herefordshire Levels of Need Guidance, *Right Help Right Time Levels of Need*, and detailed guidance are available on Herefordshire Safeguarding Children Board website.
- [Right-Help-Right-Time-Levels-of-Need 2 2024.docx](#)
 - [Children's Policies & Guidance - Herefordshire Safeguarding Boards and Partnerships](#)

- <https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance>

- 3.5 The Levels of Need Guidance shows that a child's or family's additional needs can be on a range from none to very high. The guidance will help practitioners to identify the right level of support for the child or young person in the least intrusive way while keeping them safe.
- 3.6 By referring to the Levels of Need Guidance and indicators, the college can identify when assessment and support for a child, or young person and family need "stepping up" to a referral to the MASH Team.



4. What action to take if staff have concerns about a child, young person, or adult 'at risk'

- 4.1 If staff suspect a student is being abused or is at risk of abuse, or are becoming radicalised, they are expected to report concerns to the safeguarding team through the MyConcern Process (see point 5.2 below).
- 4.2 If at any time staff feel that the person needs urgent medical assistance, they have a duty to call for an ambulance. The college first aid team should also be called in the first instance to respond before emergency support arrives.
- 4.3 If, at the time, staff have reason to believe the student is in immediate and serious risk of harm, or that a crime has been committed, this should be reported to a member of the safeguarding team who will ensure appropriate swift action is taken.

- 4.4 In the event of the DSL/DDSLs not being available, the member of staff who has concerns regarding abuse of a student should make an external referral. To assist in deciding whether a referral to Social Care is the correct option for the child and for support in ensuring a good quality referral is submitted, refer to the following guidance when completing this form:
- a) Herefordshire Levels of Need Threshold, “A Guide to Support Professional Judgement”.
 - b) HSCB’s Multi-Agency Referral Forms for MASH referrals and guidance notes.
 - c) HSCB’s Escalation Form and Process Chart.
 - d) [Children's Policies & Guidance - Herefordshire Safeguarding Boards and Partnerships](#)
 - <https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance>
- 4.5 Alleged Abuser and Victims are Both Students
- a) It is important that consideration be given to a co-ordinated approach where it is identified that both the alleged abuser and alleged victim are students.
 - b) Referral information should capture comprehensive information regarding both students.
5. **Procedure for dealing with disclosure of abuse/radicalisation and reporting concerns: Advice for all members of staff**
- 5.1 On learning of an allegation from a young person or adult “at risk” that abuse/or radicalisation has or may have occurred, college staff or volunteers should follow this guidance:
- a) Receive what is said:
 - Listen to what is being said without displaying shock or disbelief.
 - Accept what is said, staff do not need to decide whether or not it is true but record accurately.
 - Do not ask them to write down what has happened it should be recorded by the person receiving it.
 - b) Reassure the student:
 - Concerns are taken seriously and relevant action will be taken.
 - Make it clear that this information is not confidential but will only be shared with relevant parties; this will be reported through MyConcern.
 - c) React and respond to the student, but do not interrogate them:
 - Allow them to talk freely – do not put words in their mouth.

- Do not ask leading questions but ask open-ended questions such as How? What? When? Where?
- Only ask questions when necessary to clarify anything staff do not understand.
- Explain what will be done next and who has to be told.
- Inform the safeguarding team without delay.

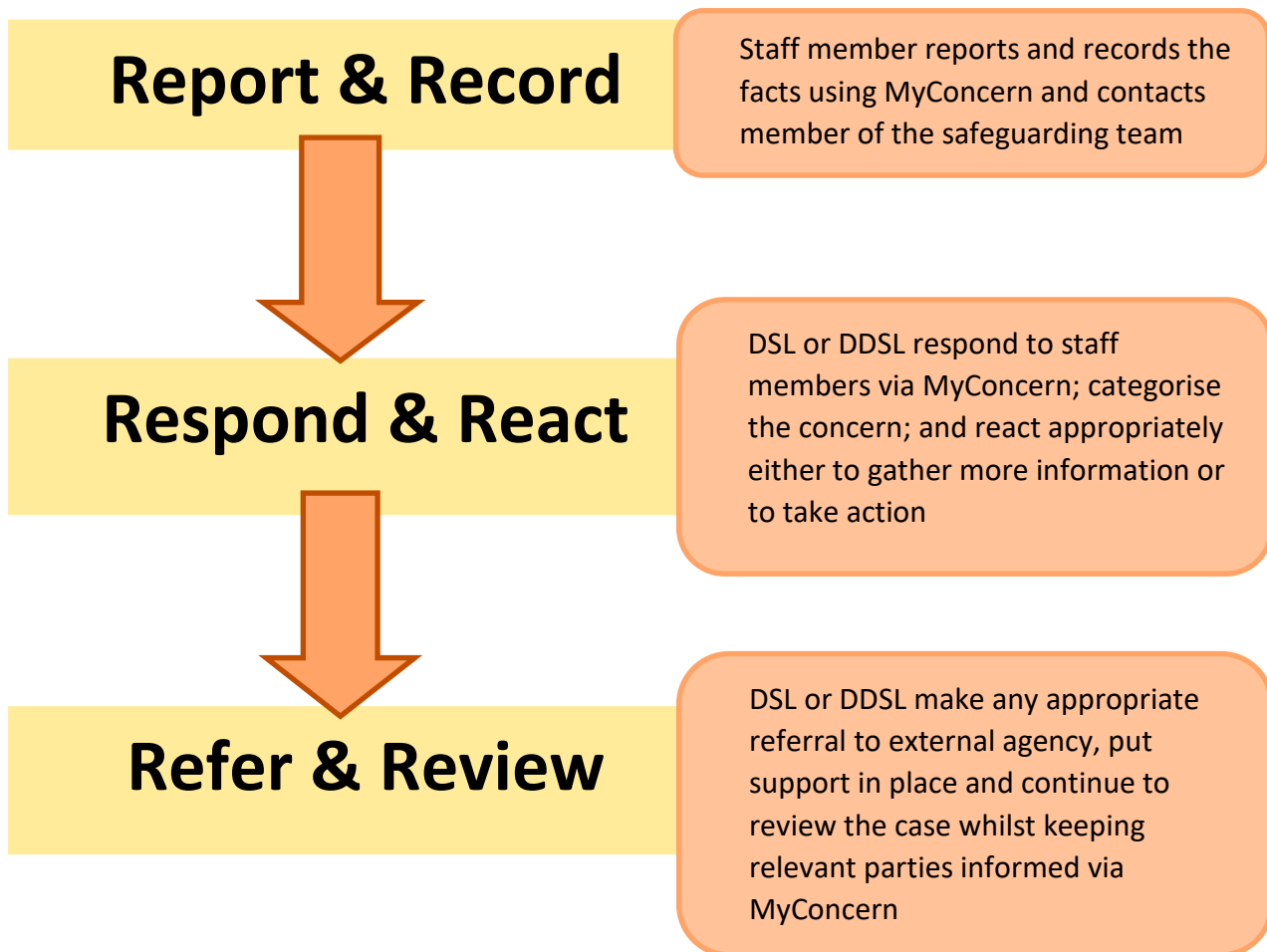
d) Record the discussion:

- Through MyConcern
- Stick to facts about what was disclosed
- Upload any original notes to MyConcern

e) Support the Student:

- Consider what support is needed for the student; dealing with a disclosure and safeguarding issues can be stressful.
- Staff should consider seeking support for themselves and discuss this with the DSL.

5.2 Process for reporting and recording safeguarding concerns and disclosures from students (*MyConcern Process*):



6. **What happens next?**

- 6.1 When someone refers a case to children's Social Care, the MASH (Multi agency Safeguarding Hub) staff gather information from every agency and use this to inform children's Social Care's decision about the most appropriate intervention to respond to young person's identified needs. The MASH team can immediately trigger a response when required which means they are able to respond to a young person's needs quickly and effectively.
- 6.2 To speak to someone in the MASH about appropriate actions to take in a case, they can be contacted on 01432 260800.
- 6.3 More information about the MASH, including a short storyboard example of how the MASH works to safeguard families and children, is available at www.herefordshire.gov.uk/MASH

Name/Department/Organisation	Contact Details
MASH (Multi agency Safeguarding Hub)	01432 260800 Report concerns about a child - Herefordshire Safeguarding (herefordshiresafeguardingboards.org.uk)
Family Assessment and Safeguarding Team	01432 261 628 01905 768 020 (Out of Hours)
Herefordshire Safeguarding Children Board	01432 260 100 Report concerns about a child - Herefordshire Safeguarding (herefordshiresafeguardingboards.org.uk)
Herefordshire Council Switchboard	01432 260 000
West Mercia Women's Aid	West Mercia Women's Aid WMWA https://www.westmerciawomensaid.org/
West Mercia Rape & Sexual Abuse Support Centre (to include support for males)	Home - WMRSASC https://www.wmrsasc.org.uk/
E-Safety (see West Mercia Consortium for more information)	Initial Contact Team - 0345 6789021 SSCB Development Officer - 01743 254251 West Mercia Police - 0300 333 3000 SITSS - 01743 254230 Child Exploitation Online Protection Centre https://www.ceop.police.uk/Safety-Centre/ Internet Watch Foundation - https://www.iwf.org.uk/
West Mercia Police	Emergency – 999 Switchboard - 0300 333 3000 Non-Emergency – 101
Freedom of Information and Data Protection	01905 331 565 01905 331 545

7. What is an early help assessment?

- 7.1 In recent years, the Common Assessment Framework has been replaced by an Early Help Assessment (EHA). The EHA is based on the same principles as the CAF but it is much simpler and more straightforward to use.
- 7.2 An Early Help Assessment is an initial assessment and planning tool that facilitates and coordinates multi-agency support. It assesses the situation of the child or young person and their family and helps to identify the needs of both the children and the adults in the family.
- 7.3 It is a shared tool that multiple agencies can use to develop a coordinated response. This improves involvement between agencies and ensures that the child and their family are getting all the support that they need from wherever they need it. By doing this, the assessment aims to resolve any problems in their early stages and therefore removes the need for the intervention of social care.
- 7.4 Information for professionals on the Early Help Assessment can be found at: [Information for professionals on EHA](#) with Early Help Assessment resources found at: [Early Help Assessment - Information for professionals](#)
- a) <https://www.herefordshire.gov.uk/schools-and-education/support-for-schools-and-settings/social-emotional-and-mental-health-semh-inclusion-service/information-for-professionals-on-the-early-help-assessment-eha/>
 - b) https://www.herefordshire.gov.uk/media/bijbquti/early_help_assessment_-_guidance_for_professionals.pdf

8. Radicalisation and Extremism

- 8.1 Young people in the UK are potentially susceptible to engagement with extremist ideologies or to targeting by extremist organisations. It is important that the college should be aware of these risks and be familiar with the support networks and processes in place to protect susceptible individuals from becoming radicalised or drawn into terrorism.
- 8.2 Refer to the college's [Prevent Policy](#) for definitions, procedures and identification of signs in young people.
- a) <https://cdn.hca.ac.uk/files/Governance-and-Policies/Policies/College-Policies/Safeguarding/Prevent-Policy-2025.pdf>

9. Confidentiality and Information sharing

- 9.1 Research and experience have shown that keeping students safe from harm requires professionals and others to share information about that individual's health and development and exposure to possible harm and about a parent who may need help, or who may not be able, to care for a student/adult "at risk". It is therefore important that, should a member of staff have concerns regarding someone's welfare, the student's Curriculum Leader, DSL, or the principal is informed in order to ensure that support is given to a student in a timely manner.

- 9.2 Sharing of information between agencies is vital for the identification and reduction of abuse, neglect or risk through effective safeguarding practice.
- 9.3 Information should be shared between the relevant professionals to explore how to protect the individual wherever abuse is alleged or suspected.
- 9.4 It is important to identify an abusive situation as early as possible so that the individual can be protected. Withholding information may lead to abuse not being dealt with in a timely manner.
- 9.5 Confidentiality must never be confused with secrecy. Staff have a duty to share information relating to suspected abuse with the Curriculum Leader, vice principal Further Education (Designated Safeguarding Lead), Deputy Designated Safeguarding Lead/s, principal, the Safeguarding Team (MASH; Multi Agency Safeguarding Hub), Care Quality Commission, Social Care Teams, or West Mercia Police.
- 9.6 Consent is not required to breach confidentiality and to make a safeguarding referral where:
- a) A serious crime has been committed (Crime and Disorder Act).
 - b) The student is deemed to be at serious risk.
 - c) Where the alleged perpetrator may go on to abuse other adults/young people.
 - d) There is a statutory requirement e.g. Children's Act 1989, Mental Health Act 1983, Care Standards Act 2000. KCSIE has expanded guidance on identifying and responding to mental health concerns, including suicidal ideation, self-harm indicators and when urgent intervention is required.
 - e) The public interest overrides the interest of the individual.
 - f) A member of staff of a statutory service, a private or voluntary service or a volunteer is the person accused of abuse, malpractice or poor professional standards.
- 9.7 Try to get consent from the student to share information, if possible. However, staff do not need consent if they have serious concerns about a student's safety and wellbeing. If they decide to share information without consent, they should record this with a full explanation of their decision.
- 9.8 If a member of staff has any doubt about the legality of sharing information, they must in the first instance consult the Curriculum Leader or Designated Safeguarding Lead/vice principal Further Education.
- 9.9 Consent is not necessary in cases where Children's Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.
- 9.10 Consent is necessary for:

- a) Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that the college have obtained consent from the parents to share information unless the college make them aware that there is a specific issue about consent. This must be discussed with a Social Worker in the Duty and Assessment Team.
 - b) Early Help assessments. Assessments are undertaken with the agreement of the child and their parents or carers.
- 9.11 If staff are in any doubt about the need for seeking consent, get advice from the DSL or from the Children's Social Care Duty and Assessment Team.
- 9.12 Staff need to keep a record of their decision to share information, with or without consent, and the reasons for it. It is just as important to keep a record of why they decided not to share information as why they did so.
- 10. Dealing with threatened or attempted suicide by students**
 - 10.1 The normal developmental issues associated with adulthood and challenges related to the learning experience place some students under emotional pressures that occasionally manifest as a threat or an attempt by the student to take their own life. The college treats all threats or attempted suicides as serious regardless of the degree of lethality involved. When a student threatens or attempts suicide, the college takes the steps necessary to protect the student.
 - 10.2 Procedures to follow when threatened or attempted suicide by a student can be found in the college's Suicide Awareness, Intervention and Response Policy.
- 11. Procedure for dealing with applicants and students with criminal convictions**
 - 11.1 The college actively promote equality of opportunity and are keen to encourage a diverse student population with a wide range of talents, backgrounds and experiences.
 - 11.2 Having a criminal conviction will not necessarily prevent applicants from gaining admission to the college. In reaching decisions on those with criminal convictions, the college will consider not only its responsibilities and duties, but also the safety and wellbeing of the individual and its ability to provide any appropriate support arrangements.
 - 11.3 Applicants on undergraduate or postgraduate programmes will be asked to declare any relevant criminal convictions on their UCAS or college application form.
 - 11.4 Relevant convictions are currently defined as:
 - a) Those convictions for offences against the person, whether of a violent or sexual nature, and convictions for offences involving unlawfully supplying controlled drugs or substances where the conviction concerns commercial drug dealing or trafficking.

- b) Unless the nature of the programme of study requires the college to ask questions about an applicant's entire criminal record, applicants are not required to tell the college about "spent" convictions as defined in the Rehabilitation of Offenders Act 1974. Please note that custodial sentences of more than two and a half years can never become "spent". Applicants sometimes voluntarily bring information about convictions in relation to other types of offence to the college's notice. Under these circumstances the college reserves the right to consider whether admission carries any risks relating to any other persons involved in the college, such as any student under 18 (FE), or adults defined as "at risk". Applicants should inform the college of any charges pending trial.
- 11.5 For applicants, if they indicate that they have a conviction or other penalty, the college will not take this any further until their application has been considered on academic grounds. The college's primary selection criteria are those relating to the qualification, skills, abilities and personal qualities the student has to offer their chosen programme of study. Once the college have reached an academic decision in principle, though, it will not make an offer until it is satisfied that the admission will not pose any unacceptable risks in relation to the factors set out in Section 8: 'Students – Criminal Convictions'.
- 11.6 In order to reach an informed decision, the college will therefore ask the applicant to provide further details on the nature of their offence. The college will need an independent account of what happened and the subsequent penalties. This may be a pre-sentence report or other statement on the circumstances surrounding their conviction and supporting information.
- 12. Safer recruitment**
- 12.1 The college has robust recruitment and vetting procedures to help prevent unsuitable people from working with children.
- 12.2 College job advertisements and application packs make explicit reference to the college's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.
- 12.3 All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- 12.4 At least one member on every short listing and interview panel will have completed safer recruitment training.
- 12.5 The principal and the nominated governor for child protection are responsible for ensuring that the college's Single Central Record of pre-employment checks is accurate and up to date.

13. Procedure for reporting and dealing with allegations of abuse made against a member of staff, a college governor, or a college volunteer

13.1 All college staff, governors and volunteers should be aware that abuse is a serious matter that can lead to a criminal conviction. Should concerns arise regarding any allegations of abuse by individuals in these positions, the college procedure for dealing with allegations of abuse must be followed. These are attached as Appendix D. The Herefordshire Safeguarding Adults Framework Section II.15 “Staff Disciplinary Procedure” must be referred to in conjunction with college procedures. This may be accessed through the following link:

<https://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance/8-lado-managing-allegations>

13.2 [Complaints and feedback - children's and young people's services – Herefordshire Council](#)

a) <https://www.herefordshire.gov.uk/social-care-and-support/childrens-social-care/complaints-and-feedback-childrens-and-young-peoples-services/>

Appendix D: Procedures for concerns against staff

1. Social situations and the College Road Campus bar

- 1.1 If a member of staff finds themselves in a social situation with students (for example mature students present at a private party the member of staff attends) they should log the occasion with the principal/Designated Safeguarding Lead as a low-level concern (see section 3 below) in order to protect themselves against possible misinterpretation.
- 1.2 Staff should be careful to maintain professional boundaries at all times in the College Road Campus bar.
- 1.3 Staff may use the bar for a meeting or immediately after a work event, for example a course group may have a drink with a visiting speaker.
- 1.4 The duty manager staff may stay later in the bar as part of their monitoring and engage in conversation with students, as may staff involved in supporting a college or SU event in the bar. Other staff should not normally stay late in the bar.

2. Employing students

- 2.1 The college recognises there may be occasions when staff, within their college role, or externally, want to offer paid/unpaid work to students and this may give students valuable work experience. However, each occasion needs to be assessed in advance to ensure it does not put either party at risk.
- 2.2 Staff shall not employ students to undertake work either internally or externally, without prior permission from a member of the Senior Leadership Team(SLT). If a staff member wishes to employ a student, then they must put a request in writing to HCA People, stating the purpose of the employment and how long the employment will be for.
- 2.3 Issues to be considered before approval include (but are not limited to):
 - a) Whether the staff have or will be involved in assessment of this student's work
 - b) If employment will compromise the independence of assessment
 - c) The location and the nature of employment
 - d) Risks around access to staff personal data
- 2.4 Staff may be required to complete a written risk assessment.

3. Low level concerns and reporting of incidents

- 3.1 All staff must understand the importance of reporting low level concerns. Refer to the college's Low Level Concerns Policy for reporting procedures.

4. Procedure for dealing with allegations of abuse against a member of staff, governor or volunteer

4.1 Introduction

- a) In some instances, staff of education institutions have been found responsible for abuse of children, young people or adults who are, or become, susceptible. Because of their frequent contact with children and young people, staff may have allegations of abuse made against them. The college recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.
- b) The college policy will be to:
 - Accept nothing
 - Believe no-one
 - Check and clarify everything
- c) The college recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. “No Secrets” (2000) with supplementary guidance provided by 2005’s “Association of Directors of Social Services Safeguarding Adults” (ADASS) provides a national framework of standards for good practice and outcomes in safeguarding work.
- d) The Herefordshire Safeguarding Adults Framework has been developed, using these as a reference, to enable all agencies to work effectively together to support safeguarding processes that emphasise prevention and early intervention. 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 should do so with sensitivity and should act in a careful, measured way.

4.2 Receiving an allegation from a young person or adult “at risk”:

- a) A member of staff who receives an allegation about another member of staff (including the principal, Governors, Clerk to the Governors or a volunteer) from a young or vulnerable person should immediately report the allegation to the designated safeguarding team who will inform the principal, unless the principal is the person against whom the allegation is made. In cases where members of the designated team are the subject of the allegation staff may pass on the allegation directly to the principal. In cases where the principal is the subject of the allegation the report should be made to the Senior Staff Member with lead responsibility or the Designated Governor. The principal (or designated person if the allegation is against the principal) should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the principal (or designated person).
- Record information about times, dates, locations and names of potential witnesses.

4.3 Initial assessment by the principal (or designated person):

- a) The principal (or designated person) should make an initial assessment of the allegation, consulting with the Senior Staff Member with Lead Responsibility, the Designated Governor, and Herefordshire Safeguarding Board as appropriate (Local Authority Designated Officer LADO, by contacting the LADO office on: 01432 261739). Where the allegation is considered to be either a potential criminal act or indicates that the child or vulnerable person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Police.
- b) It is important that the principal (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision as to whether or not the allegation warrants further investigation.
- c) Other potential outcomes are:
 - The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or vulnerable person adult “at risk”. The matter should be addressed in accordance with the college disciplinary procedures and a note placed on the member of staff’s file.
 - If, after a warning, a subsequent report is received, this may escalate to the next level.
 - The allegation can be shown to be false because the facts alleged could not possibly be true.

4.4 Enquiries and investigations

- d) Where initial assessment indicates the need for further enquiry the principal (or designated person) should consult with the Senior Staff Member with Lead Responsibility, the Designated Governor and report to the Local Authority Children’s Social Care and seek a LADO (Local Authority Designated Officer) referral (part V of [Working Together to Safeguard Children 2026](#)).
- e) The Social Care referral team will advise on 3 strands in the consideration of an allegation:
 - A police investigation of a possible criminal offence.

- Enquiries and assessment by children's Social Care about whether the student is in need of protection.
 - Consideration of disciplinary action in respect of the individual, which includes guidance for suspending a member of staff/volunteer.
- f) Enquiries by Social Services or the Police are not to be confused with internal, disciplinary enquiries by the college. The college may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the Police, have no power to direct the college to act in a particular way. However, the college should assist the agencies with their enquiries.
- g) The college shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.
- h) If there is an investigation by an external agency, for example the Police, the principal (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The principal (or designated person) is responsible for ensuring that the college gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The principal (or designated person) shall advise the member of staff that they should consult with a representative, for example, a trade union.
- i) Subject to objections from the Police or other investigating agency, the principal (or designated person) shall:
- Inform the person and/or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
 - Ensure that the parents/carers of the person making the allegation have been informed that the allegation has been made and what the likely process will involve.
 - Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve and keep them informed of the progress of the case. If the person is a member of a union, they should be advised to make contact with that body at the outset. The identity of the person making the allegation shall not normally be shared with the member of staff.
 - Inform the Chair of Governors and/or the Designated Safeguarding Governor of the allegation and the investigation.

- j) The principal (or designated person) shall keep a written record of the action taken in connection with the allegation.

4.5 Suspension of staff

- a) Suspension should not be automatic. The decision to suspend can only be made by the principal or a senior post holder to whom the responsibility has been designated. In respect of the principal, suspension can only be carried out by the Chair of Governors (or in their absence, the Vice Chair).
- b) Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- c) Suspension should only occur for a good reason. For example:
- Where a young person or adult is at risk.
 - Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
 - Where necessary for the good and efficient conduct of the investigation.
- d) If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.
- e) Prior to making the decision to suspend, the principal (or Chair/Vice Chair of Governors) should interview the member of staff. This should occur with the approval of the Herefordshire Safeguarding Team and appropriate agencies. In particular, if the Police are engaged in an investigation the officer in charge of the case should be consulted.
- f) The member of staff should be advised to seek the advice and/or assistance of their trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.
- g) During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to them at the meeting and prepare a response, although that adjournment may be brief.

- h) If the principal (or Chair/Vice Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible, and ideally within one working day.
- i) Where a member of staff is suspended, the principal should address the following issues:
- The Chair of Governors should be informed of the suspension in writing.
 - The governing board should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing board should be minimal.
 - Where the principal has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the college.
 - The parents/carers of the person making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the vulnerable adult “at risk” making the allegation of the suspension.
 - Senior staff who need to know of the reason for the suspension should be informed.
 - Depending on the nature of the allegation, the principal should consider with the nominated Governor whether a statement to the students of the college and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity. Only designated press liaison staff (after consultation with principal or Chair of Governors) will have the authority to have contact with the media.
- j) The principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The Herefordshire Safeguarding Team and external investigating authorities should be consulted.
- k) The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.
- l) The suspension should remain under review in accordance with the college disciplinary procedures.

4.6 The Disciplinary Investigation

- a) The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

- b) The member of staff should be informed of:
 - The disciplinary charge against them.
 - Their entitlement to be accompanied or represented by a trade union representative or friend.
- c) Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
- d) The person making the allegation and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to college of the member of staff (if suspended).
- e) The principal (or designated person) should give consideration to what information should be made available to the general population of the college.

4.7 Allegations without foundation/unproven allegations

- a) Any malicious accusations made by a student will be addressed by following the appropriate student disciplinary policy. Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and the Safeguarding Team should determine whether the person concerned is in need of services or may have been abused by someone else.
- b) In consultation with the designated senior member of staff and/or the designated Governor, the principal shall:
 - Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
 - Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
 - Where the allegation was made by a vulnerable adult “at risk” other than the alleged victim, consideration to be given to informing the parents/carers of that person.
 - Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

4.8 Records

- a) It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details are retained on the member of staff’s personal and confidential file.

- b) If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the college's statutory duty to inform the Independent Safeguarding Authority (ISA).
- c) If the allegation is substantiated, Hereford College of Arts will ensure that ISA have been notified (usually via the Safeguarding Team).

4.9 Monitoring effectiveness

- a) Where an allegation has been made against a member of staff, the nominated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the college's procedures and/or policies and/or which should be drawn to the attention of the Herefordshire Safeguarding Children Board. Consideration should also be given to the training needs of staff.

5. **Responding and dealing with a staff member's concerns or allegations against or about a colleague**

- 5.1 This policy and its related procedures need to emphasise a culture of openness and accountability. It is the responsibility of all staff (including volunteers) to ensure that the welfare of students is paramount. In the spirit of openness, it is important that staff can raise concerns about a colleague's behaviour towards, or relationship with a student(s) that could be construed as being, or may lead to putting the safety or wellbeing of the student in danger/at risk.

- 5.2 Reference the Whistleblowing Policy & Procedures, Sections 4, 5, and 6:

"Procedure for Making a Disclosure Information which a worker reasonably believes tends to show one or more of the situations given in Section 4 should promptly be disclosed to their line manager so that any appropriate action can be taken.

- 5.3 *If it is inappropriate to make such a disclosure to their line manager, a worker can raise the issue with a member of the Senior Leadership Team.* In order to develop and promote a culture of openness and to encourage staff and students to disclose information about any wrong-doing or malpractice in the college, the college will (as a matter of course) investigate, objectively check and clarify all reports, for the safety and benefit of all parties:

- a) Accept nothing.
- b) Believe no-one.
- c) Check everything.

6. **Recruitment and selection**

- 6.1 The college has recruitment and selection procedures which are followed for all staff appointments and for any volunteers working with children and young people and/or adults.

Appendix E: FGM Mandatory Reporting Guidance

1. Overview

- 1.1 The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and Social Care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:
- a) Are informed by a girl under 18 that an act of FGM has been carried out on her or;
 - b) Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth (see section 2 below for further information).
- 1.2 For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).
- 1.3 Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply.
- 1.4 The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if they know that another individual from their profession has already made a report; there is no requirement to make a second.
- 1.5 The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, staff should follow local safeguarding procedures. For more information, please see Working Together to Safeguard Children (in England) or Working Together to Safeguard People (in Wales) as appropriate, and/or the multi-agency statutory guidance on FGM.
- 1.6 Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

2. Visually identified cases – when professionals might see FGM

- 2.1 The duty applies to cases someone discovers in the course of their professional work. If they do not currently undertake genital examinations in the course of delivering their job, then the duty does not change this. Most professionals will only visually identify FGM as a secondary result of undertaking another action.
- 2.2 For healthcare professionals, if, in the course of their work, they see physical signs which they think appear to show that a child has had FGM, this is the point at

which the duty applies – the duty does not require there to be a full clinical diagnosis confirming FGM before a report is made, and one should not be carried out unless they identify the case as part of an examination already under way and are able to ascertain this as part of that. Unless they are already delivering care which includes a genital examination, they should not carry one out.

- 2.3 For teachers and Social Workers, there are no circumstances in which they should be examining a girl. It is possible that a teacher, perhaps assisting a young child in the toilet or changing a nappy, may see something which appears to show that FGM may have taken place. In such circumstances, the teacher must make a report under the duty, but should not conduct any further examination of the child.

3. Verbally disclosed cases

- 3.1 If they are a relevant professional and a girl discloses to them that she has had FGM (whether she uses the term “Female genital mutilation” or any other term or description, e.g. “cut”) then the duty applies. If, in the course of delivering safe and appropriate care to a girl they would usually ask if she has had FGM, they should continue to do so.
- 3.2 The duty applies to cases directly disclosed by the victim; if a parent, guardian, sibling or other individual discloses that a girl under 18 has had FGM, the duty does not apply and a report to the police is not mandatory. Any such disclosure should, however, be handled in line with wider safeguarding responsibilities - in England, this is likely to include referral to children’s social services, and in Wales the disclosure must be immediately referred to the local authority.
- 3.3 Further information, including advice and support on how to talk to girls and parents/guardians about FGM, is available in the multi-agency statutory guidance on FGM.
- 3.4 More information is available in the General Medical Council’s guidance on intimate examinations and the child protection examinations section of their guidance on protecting children and young people

4. Timeframe for reports

- 4.1 Reports under the duty should be made as soon as possible after a case is discovered; best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. Staff should act with at least the same urgency as is required by their local safeguarding processes.
- 4.2 In order to allow for exceptional cases, a maximum timeframe of one month from when the discovery is made applies for making reports. However, the expectation is that reports will be made much sooner than this.
- 4.3 A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g.

a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made. If staff think they are dealing with such a case, they are strongly advised to consult colleagues, including their DSL, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

- 4.4 Where they become aware of a case, the legislation requires them to make a report to the police force area within which the girl resides. The legislation allows for reports to be made orally or in writing.
- 4.5 When making a report to the Police, the legislation requires them to identify the girl and explain why the report is being made. While the requirement to notify the Police of this information is mandatory and overrides any restriction on disclosure which might otherwise apply, in handling and sharing information in all other contexts they should continue to have regard to relevant legislation and guidance, including the Data Protection Act 1998 and any guidance for their profession. The provisions of the Data Protection Act 1998 do not prevent a mandatory report to the Police from being made.
- 4.6 While the legislation requires a report to be made to the Police, it does not specify the process for making the report. If organisations have a formal agreement with the relevant team in the Police that reports can be made to them directly, then reports may be made this way. In all cases staff should ensure that they are given a reference number for the case and that they keep a record of it.

5. Making a report

- 5.1 It is recommended to make a report orally by calling 101, the single non-emergency number.
- 5.2 When staff call 101, the system will determine their location and connect them to the police force covering that area. They will hear a recorded message announcing the police force they are being connected to. They will then be given a choice of which force to be connected to; if they are calling with a report relating to an area outside the force area which they are calling from, they can ask to be directed to that force.
- 5.3 As required by section 5B (5)(c) of the Female Genital Mutilation 2003 Act (as amended by the Serious Crime Act 2015).
 - a) Calls to 101 are answered by trained police officers and staff in the control room of the local police force. The call handler will log the call and refer it to the relevant team within the force, who will call the individual back to ask for additional information and discuss the case in more detail.
 - b) Staff should be prepared to provide the call handler with the following information: Explain that they are making a report under the FGM mandatory reporting duty

- Staff details:

- Name
 - contact details (work telephone number and e-mail address) and time when they will be available to be called back
 - role
 - place of work
 - details of their organisation's Designated Safeguarding Lead: contact details (work telephone number and e-mail address) or place of work
 - The girl's details:
 - Name
 - age/date of birth
 - address
 - c) If applicable, confirm that they have undertaken, or will undertake, safeguarding actions, as required by the Working Together to Safeguard Children (in England) or Working Together to Safeguard People (in Wales) as appropriate.
- 5.4 They will be given a reference number for the call and should ensure that they document this in their records (see 'Record Keeping' section below).
- 6. Record Keeping**
- 6.1 Throughout the process, they should ensure that they keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how they reported the case to the Police (including the case reference number). They should also ensure that their organisation's DSL is kept updated as appropriate.
- 7. Informing the child's family**
- 7.1 In line with safeguarding best practice, they should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means. Wherever possible, they should have this discussion in advance of/in parallel to the report being made. Advice and support on how to talk to girls and parents/guardians about FGM is available in the multi-agency statutory guidance on FGM.
- 7.2 However, if they believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, they should not discuss it. For more information, please see information sharing advice for safeguarding practitioners. If staff are unsure or have concerns, they should discuss these with their DSL.

8. Staff responsibilities after making a report

- 8.1 In relation to any next steps, staff should continue to have regard to their wider safeguarding and professional responsibilities, including any relevant standards issued by the organisation's regulatory body. For example, in a health context, responsibilities include responding to the physical and psychological needs of the girl.
- 8.2 Depending on their role and the specific circumstances of the case, they may be required to contribute to the multi-agency response or other follow up to the case which will follow their report (see Appendix C). If staff are unsure, they should seek advice from their DSL.

Appendix F: Online Learning

1. In the event teaching provisions must be delivered online:

- 1.1 Hereford College of Arts' Safeguarding and Child Protection Policy and Procedure would remain fundamentally the same: Staff should respond robustly to safeguarding concerns and contact the DSL in line with the college's established safeguarding procedure.
- 1.2 The college's approach ensures the DSL or a deputy is always contactable while the college site is open or when online teaching is taking place. In the unusual circumstance when this is not possible, the Deputy DSL will be contactable and/or a member of the Senior Leadership Team.

2. Identifying vulnerability

- 2.1 The college have put in place arrangements in respect of the following groups:
 - a) Looked After Children.
 - b) Children subject to a Child Protection Plan.
 - c) Children or a vulnerable adult who have, or have previously had, a Social Worker.
 - d) Children or vulnerable adults with an EHCP.
 - e) Other children or adults that college considers vulnerable.
 - f) Vulnerable adults staying in halls of residence or in student accommodation.
- 2.2 Each of these children/adults has an individual plan which where appropriate is shared with other agencies involved in their care, including where appropriate their Social Worker.
- 2.3 The college reviews this arrangement regularly and ensures that all students with an EHCP are contacted directly by either a tutor or the Wellbeing Development Lead weekly, this is over and above their usual contact via their online course of study.
- 2.4 The college will continue to provide support for students within the above categories over the holiday break periods. All students have access to the Health Assured telephone counsellor 365 days a year
- 2.5 Absences are flagged by registry staff but this does not apply to every student who is deemed vulnerable by the above categories. If the college has a personal risk assessment (e.g suicidal student or police trigger plan), then staff will be aware that any absences must be flagged immediately. Where a student is expected and does not arrive, the college will contact the student. If contact is not possible by 1pm the DSL must be informed. The DSL will attempt a range of methods to

contact the student and if required, the parent/guardian but if necessary, arrange a home visit by the college or another appropriate agency.

3. Child-on-Child abuse

- 3.1 The college recognises the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Staff will remain vigilant to the signs of Child-on-Child abuse, including those between young people who are not currently attending campus.

4. Risk online

- 4.1 The college has taken on board guidance from the [UK Safer Internet Centre](#) on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. KCSIE 2026 has included **updates to online safety to include AI** New references to generative AI, deepfakes, misinformation, disinformation and conspiracy theories as emerging safeguarding risks.

a) <https://swgfl.org.uk/resources/safe-remote-learning/>

- 4.2 The college has reviewed the code of conduct and information sharing policy, and produced additional information to promote safe and best practice in remote learning with students.

- 4.3 Staff have read the [20 safeguarding considerations for livestreaming](#) prior to delivering any livestreamed sessions.

a) <https://cdn.icmec.org/wp-content/uploads/2020/04/Safe-Lessons-by-Video-and-Livestream.pdf>

- 4.4 Children and young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the college, [Childline](#), the [UK Safer Internet Centre](#) (<https://reportharmfulcontent.com>) and [CEOP](#) (<https://www.ceop.police.uk/safety-centre/>)

- 4.5 Parents and carers have received information about keeping children safe online with peers.

- 4.6 Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#).

a) <https://saferinternet.org.uk/professionals-online-safety-helpline>

Appendix G: Filtering and Monitoring

1. Process

- 1.1 Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. KCSIE 2026 states that Schools and colleges must review the effectiveness of filtering and monitoring systems at least annually and record the review.
- 1.2 As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- 1.3 Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- 1.4 Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).
- 1.5 The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.
- 1.6 The college keeps its filtering under reviews. Current filters include:
 - a) Weapons
 - b) Extreme
 - c) Phishing & Fraud
 - d) Military & Extremist
 - e) Gambling
 - f) Pro- Suicide & Self Harm
 - g) Criminal Activity
 - h) Marijuana
 - i) Intellectual Piracy
 - j) Spyware & Malware
 - k) Sexually Explicit
 - l) Nudity

m) Intolerance & Hate

n) Hacking

- 1.7 As the DSL, the vice principal FE is the SLT member responsible for safeguarding and works closely with the Operations Manager who oversees filtering and monitoring.