Safeguarding and Child Protection Policy

HARROW, RICHMOND AND UXBRIDGE COLLEGES POLICY AND PROCEDURES

Policy No:	S18
Subject:	Safeguarding and Child Protection Policy
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Person responsible:	Designated Safeguarding Leads at Harrow, Richmond and Uxbridge
Approved by:	Senior Leadership Team, Governors
For action by:	All staff
For information to:	All staff & students

1. Introduction and Policy Aims

1.1 HRUC has a duty to keep children and vulnerable adults safe. This includes how we protect children and vulnerable adults from experiencing harm and how we should respond when we suspect or confirm that a child or vulnerable adult is being harmed. This policy is informed by the definition of safeguarding as described in [Working Together to Safeguarding Children 2023.](#)

1.2 This policy applies to all College staff, students and contracted staff, whether they work or study in the main College campuses, outreach centres or other designated areas, volunteers and governors. The policy applies to students on work experience and placement programmes and those engaged on any College organised off site activity.

1.3 Children are at the centre of everything we do at HRUC. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our College know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

1.4 We aim to make sure that:

- The school has a clear process in place, which is shared with and followed by all members of the school community when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse or neglect, such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, students, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

2. Definitions

2.1 **Safeguarding** means the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes:

- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop
- providing help and support to meet the needs of children as soon as problems emerge

2.2 **Child protection** means the processes carried out to protect children who have been identified as suffering or being at risk of suffering significant harm.

2.3 **Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

2.4   **Child** means everyone under the age of 18.

2.5   **Vulnerable adults** means those aged over 18 who may be considered vulnerable to and unable to protect themselves from abuse or neglect. The definition of Vulnerable is taken from KCSIE 2025 for children, and the Care Act 2014 for adults.

2.6   **Parent** means birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

2.7   **Statutory** means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools, colleges and local authorities must do to follow the law.

2.8   **The local safeguarding partnership** has three safeguarding partners:

- the chief officer of police for an area falling within the local authority (police)
- the local authority (children's services), and
- the Integrated Care Board for an area within the local authority (health)

2.9   HRUC has three local safeguarding partnerships with which we work: Harrow Safeguarding Children Partnership, Kingston and Richmond Safeguarding Children Partnership, and Hillingdon Safeguarding Children Partnership. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by the local SCPs or the London Child Protection Procedures and Practice Guidance.

2.10   HRUC will publish our safeguarding and child protection policy on our website and hard copies will be available on request from reception.

3.   Key personnel

Senior designated safeguarding lead (DSL) Gavin Hughes RuTC Principal and group DSL PA to the Principal: Jacky.Luo@hruc.ac.uk	Site designated safeguarding leads Harrow: Lee Janaway Studentwellbeing@hruc.ac.uk Richmond : Cait Orton safeguardingrutc@hruc.ac.uk Uxbridge: Sharon Croxon studentsupport@uxbridgecollege.ac.uk
Chair of governors Nicholas Davies clerk@hruc.ac.uk	Designated governor for safeguarding/ child protection Niran Mothada clerk@hruc.ac.uk

Designated teacher for children looked after	Special educational needs and disabilities coordinator (SENDCo)
Harrow: Lee Janaway Studentwellbeing@hruc.ac.uk Richmond : Cait Orton safeguardingrutc@hruc.ac.uk Uxbridge: Sharon Croxon studentsupport@uxbridgecollege.ac.uk	Sue Tarrant Sue.Tarrant@hruc.ac.uk

3.1 Children's services

3.1.1 *Contacting children's services:*

3.1.2 Go to section 6 of this policy for in-school procedures.

3.1.3 Anyone can tell children's services about a child, young person or parent/carer who needs support. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse or exploitation.

3.1.4 Each local authority has its own children's services department that can be contacted directly. This government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK

3.1.5 Alternatively the NSPCC have a professionals helpline which is able to assist with making a referral to the appropriate children's services team.

3.1.6 If a child is in **immediate danger**, the police should be contacted on 999.

3.1.7 If it is not an emergency, but there is a concern that a child is at risk, children's services should be contacted by phone to discuss the concern.

3.2 Local authority designated officer (LADO)

Every local authority has a legal responsibility to have a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the Principal and the chair of governors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

LADO Hillingdon   01895 250 975

LADO Richmond   020 8547 5008

LADO Harrow   020 8736 6435

4. The law (legislation) and statutory guidance

4.1 In addition to local arrangements and the [London Child Protection Procedures and Practice Guidance](#), HRUC also follows the laws and statutory guidance below:

a) [Keeping children safe in education 2025 guidance](#), from now on referred to as KCSiE, sets out the legal duties all schools and colleges must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

b) [Working Together to Safeguard Children 2023](#) guidance produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

c) [Education Act 2002](#), section 175 places a duty on Local Education Authorities, and on governing bodies of schools and further education institutions to keep children safe and promote the welfare of students.

d) The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.

e) [The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

f) [The Equality Act 2010](#) states that schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our students with protected characteristics to make sure their needs are met. The [Equality Act 2010: advice for schools](#) advises us further.

g) The [Prevent duty guidance: for further education institutions in England and Wales](#) imposes a duty on "specified authorities", when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for further education institutions in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

h) [The Public Sector Equality Duty (PSED)](#) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure students have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our college is run.

i) Further, and more specific, legislation is covered throughout this policy in the relevant sections. Some government guidance is not statutory - instead it supports practitioners, like college staff, in the decisions we need to make to keep children and vulnerable adults safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

5.   Roles and responsibilities

Everybody in our College has a responsibility for safeguarding. Some members of our College have specific safeguarding responsibilities.

5.1   The Governing Board

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything HRUC does. Everyone at the College is involved in the whole-college approach to safeguarding and online safety is a theme throughout.
- The College's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the College's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The College leadership team are held to account for the College's safeguarding arrangements.
- Safeguarding is a standing item on the agenda for governor meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources, and support needed to carry out the role effectively
- A governor with senior board level lead takes leadership responsibility for the College's safeguarding arrangements (known as the safeguarding link governor).
- There is an appointed designated teacher at each College for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting students with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSiE.
- The College adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff read the appropriate part of KCSiE.
- Students are taught about keeping themselves and others safe, including when online.
- The board does all that they reasonably can to limit children's exposure to online risks from the College's online IT systems and assign a member of the senior leadership team and a governor to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place including DBS (enhanced) checks), and that records are kept of such checks. The College reserves the right to carry out online checks of information in the public domain as part of recruitment procedures.
- Procedures are in place to identify and address children absent from education, including persistent absence and when safeguarding concerns coincide.
- There are procedures for reporting and managing safeguarding concerns about adults who work for the college. The chair of governors will manage any allegations against the Principal/ CEO.
- There are effective safeguarding arrangements for when the site is being hired/let.
- Alcohol is not consumed by staff on College trips or events on or off site.
- All members of the governing board receive safeguarding training at induction, which is regularly updated.
- All governors sign to say they have read and understood KCSiE and this policy.

5.2   The safeguarding link governor - Niran Mothad

- They meet regularly with the DSL and site DSLs which allows them to monitor how HRUC's safeguarding policies and procedures are being put into practice.
- Every two years, they are part of the safeguarding audit, led by the DSL.
- They are the governing board's safeguarding specialist, feeding back their findings following visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the College's safeguarding arrangements.
- They keep up to date with the local safeguarding arrangements and guidance.

5.3   College Principals – Dylan McTaggart (Group Executive Principal), Gavin Hughes (Richmond Principal), Clive Hodge (Harrow Principal)

- This policy and other safeguarding-related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive regular safeguarding training, which is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for students to express their views and give feedback, which are used to inform the whole College approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff (see Appendix 2) and make the final decision regarding all low-level concerns.

5.4   The senior designated safeguarding lead (DSL) – Gavin Hughes

The DSL has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from the College's leadership team. HRUC has site DSLs and deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:

- reading and following KCSiE
- always being available during college hours for staff in College to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of children, including taking part and/or supporting other staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of HRUC's role in making referrals about suspected abuse, neglect or exploitation.
- understanding the importance of sharing information, including referring cases to relevant agencies (for example, children's services, the police, the Channel Programme and/or the

Disclosure and Barring Service (DBS)) when appropriate, and supporting staff who make referrals directly

- understanding and following local safeguarding procedures, in addition to attending relevant training to ensure they are acting in line with the local safeguarding arrangements
- having the lead responsibility for online safety, and oversight and checking the effectiveness of filtering and monitoring systems and their reports
- being aware of the requirement for children to have an Appropriate Adult, as described in [PACE Code C 2019](#)
- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date and kept as per [section 8](#)
- making sure all staff have access to this policy (and the wider safeguarding procedures) and that the policy is available publicly and reviewed annually
- making sure that all staff (including third-party staff and contractors) have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSiE
- working alongside the governing body to update and review procedures and how they are being implemented, including jointly completing an annual safeguarding self-audit
- promoting the educational outcomes of students who have or had a social worker, by sharing information about child protection issues with teaching and leadership staff
- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them

5.5   Site designated safeguarding leads – Lee Janaway (Harrow), Cait Orton (Richmond), Sharon Croxon (Uxbridge):

- are trained to the same standard as the designated safeguarding lead
- will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see [Annex C of KCSiE.](#)

5.6   IT provider

- maintains the filtering and monitoring systems
- provides filtering and monitoring reports
- completes actions following concerns or checks to the system

5.7   All College staff

- sign to say they have read the relevant part of KCSiE annually
- have a responsibility to provide a safe environment in which children can learn
- will follow the College's procedures for identifying and reporting any concerns and issues about the College's online filtering and monitoring systems
- will follow the College's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure
- will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and LADO

- create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns
- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct)

5.8   What staff need to know is covered in the training section of this policy.

6.   What to do if you have concerns about a child's welfare

6.1   If staff have any concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the [What to do if you're worried a child is being abused](#) government guidance alongside the College's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

6.1.1.   Staff should not investigate concerns or allegations themselves but should report them immediately to a designated Safeguarding Officer. HRUC uses the CPOMS system for raising and recording safeguarding concerns. Concerns must be recorded in writing on CPOMS, although this may be alongside a discussion with a safeguarding officer or DSL. Written records of concerns about children and students will be kept, even where there is no need to refer the matter immediately.

6.1.2.   We recognise the significant emotional impact being involved with, or aware of, safeguarding incidents can have. **Contact our safeguarding team if you need any support during or following a safeguarding incident you have been involved in.** Safeguarding information for visitors and contractors is clearly displayed at reception.

6.1.3.   If a child is in immediate danger or is suffering or likely to suffer significant harm.

6.1.4.   Where possible referrals should be made by a DSL or Safeguarding officer. However, safeguarding is everyone's responsibility and a referral should be made to the police and/or children's services **immediately** if a child is in immediate danger, or is suffering or likely to suffer significant harm. **Anyone** can make a referral. If you make the referral, you will update the DSL or a deputy as soon as is practically possible.

6.2   Disclosures

6.2.1   We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- children may not feel ready or know how to tell someone they are being harmed
- the child may not realise what is happening to them as harmful
- they may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, a disability and/or sexual orientation or language barriers

6.2.2   Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for an individual or family, rather than take what is being said on face value or making assumptions. We encourage staff to ask the student if they are OK or if they can help in any way.

6.2.3   A child who makes a disclosure may have to tell their story more than once, such as to the police and/or social workers. At HRUC, we know how important it is that a child's first experience of talking to a trusted adult about a worry they have is a positive one.

6.2.4   Handling a disclosure

- listen to them carefully and believe what they are saying. Do not be afraid of silent moments
- be careful not to express your own views or feelings and stay calm
- do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as: "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your evidence (and the child's) in any later court proceedings
- if there are injuries or marks on the child, do not examine the child intimately or take pictures
- reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner
- do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted
- tell the child it is not their fault, and you are taking them seriously
- explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help

6.2.5   After a child has made a disclosure

- write up the conversation as soon as possible
- make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible
- do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to
- get support for yourself if you need it

6.2.6   Recording a disclosure or safeguarding concern

- record the date, time, place and persons present
- use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it
- record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map
- keep any original notes you have made on file
- if using a paper form, sign and date the write-up
- do not ask children to make written statements themselves or sign records

6.3   Concerns about a child who is **not** in immediate danger, or is suffering or likely to suffer significant harm

6.3.1.   The flowchart on page 24 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services or the NSPCC, if necessary.

6.3.2   The DSL and deputy are aware of the [London safeguarding children partnership's threshold document](#), which will be used to inform their response to any safeguarding concern. If you are dissatisfied with the response from the DSL or children's services, you should ask for the decision to be reconsidered, giving your reasons for this. If you remain dissatisfied, follow the local escalation procedure [Resolving Professional Differences – London Safeguarding Children Procedures](#).

6.3.3   Early help

- Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At HRUC we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

- Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family – discuss with the relevant Early Help Resilience Network to ensure all identified needs are supported effectively and they get multi-agency support.

- If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

- We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSiE 2025.

6.3.4   Referral to children's services

- Concerns about a student or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

- If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral the student's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves.

6.4   If a child is at risk of female genital mutilation or it has taken place

6.4.1   Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

6.4.2   Teachers

- For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. While all staff should speak to the DSL (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

- Teachers who come to know, in the course of their work, that FGM has been carried out on a child must directly report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

6.4.3   Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. staff will speak to the DSL or a deputy and follow local safeguarding procedures.

6.5   Concerns about nudes or semi-nudes

6.5.1   Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately using the College's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

6.5.2.   Staff reserve the right to confiscate a device in the possession of a student if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the government's Searching, screening and confiscation: advice for schools guidance.

6.5.3.   The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

6.5.4.   The initial review meeting will consider the initial evidence and aim to establish:

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

6.5.5.   The DSL will make an immediate referral to the police and/or children's services if:

- the incident involves an adult.
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- what they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
- the images involves sexual acts and any student in the images or videos is under 13.
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, if they are presenting as suicidal or self-harming.
- they become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude'

6.5.6.   If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our College's pastoral support, behaviour procedures and, if appropriate, the local network of support.

6.5.7.   The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

6.5.8.   Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child, parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a College device or network

6.5.9.   Deletion of images

- If the College has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance.

- There is further information in the Sharing nudes and semi-nudes section of this policy.

6.6   Child-on-child abuse, including sexual violence and sexual harassment

6.6.1.   Responding to allegations of child-on-child abuse:

- Follow the 'handling a disclosure' procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services.

6.6.2.   The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.

2. Complete an early help assessment.

3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.

4. The police will still be informed of any criminal offences, even if the child is aged under the criminal age of responsibility. The police will take a welfare approach.

6.6.3.   The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, any discussions had, and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

6.6.4.   Where the DSL, children's services or the police decide the concern should be handled by the College internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. This includes access to College support services such as counselling.

6.6.5.   Responding to allegations of sexual harassment and sexual violence:

Using the DSL's or a deputy's professional judgement, the College will make decisions about and address the incident based on the Hackett tool (below). We will request the support of other agencies, such as children's services and the police, if necessary.
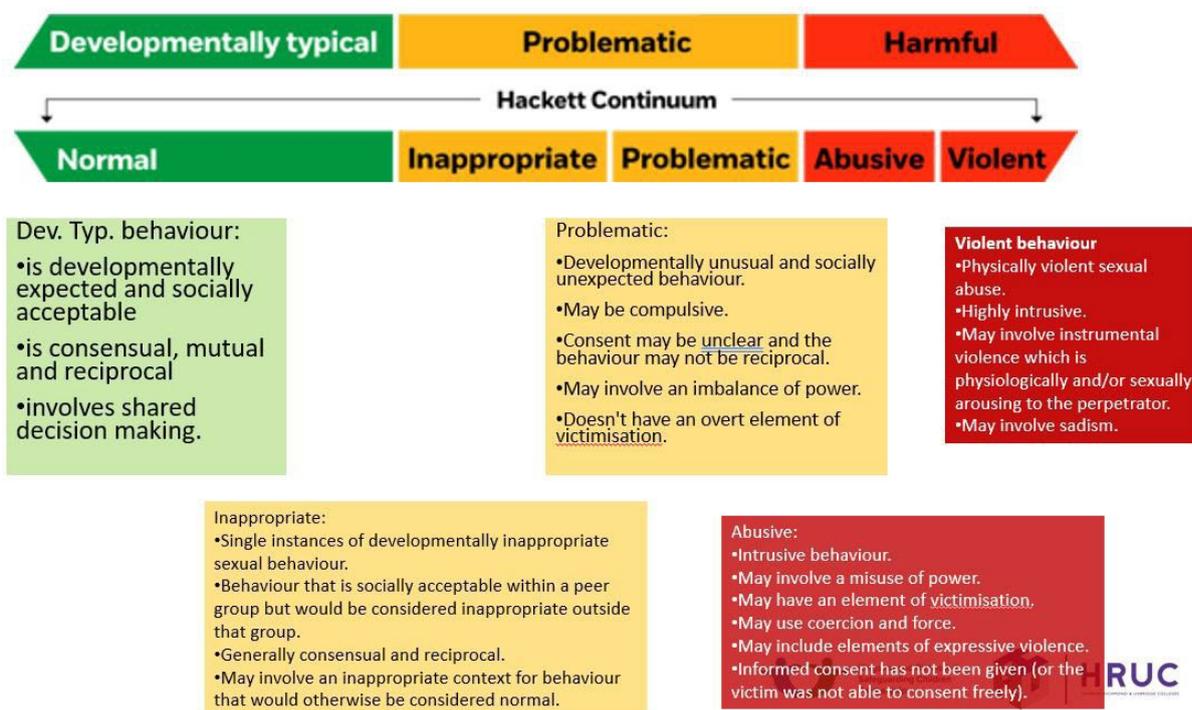
We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. **Hackett Inappropriate:** Manage internally using the behaviour policy and pastoral support.
2. **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault. We will follow the When to call the police guidance.

The management of children and young people with sexually harmful behaviour is complex. HRUC will work with other relevant agencies to maintain the safety of the whole College community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case-by-case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all students (and, if appropriate, staff) at the College, especially any actions that are appropriate to protect them from the alleged instigator or from future harm
- the time and location of the incident and any action that can make the College safer

6.6.6.   Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

6.6.7.   If a child who has experienced sexual violence or sexual harassment asks the College not to make a referral

6.6.8.   If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against the DSL's or a deputy's duty to protect them and other children on a case-by-case basis. If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police.

6.6.9.   We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up which staff need to know and any support which will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

6.6.10.   Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

6.7   Concerns about mental health

6.7.1   At HRUC all staff are aware that aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children can also become temporarily vulnerable to safeguarding risks due to mental ill-health.

6.7.2   Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to mental health support services and/or children's services.

6.7.3   If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first. If you have a mental health concern about a student that is not a safeguarding concern, please refer the student-to-Student Services for additional support.

6.7.4   Where concerns arise that a child's mental health may be impacting on their ability to study, including prior to enrolment, the College may implement the Fitness to Study process. See the College's Social, Emotional and Mental Health (SEMH) Policy and Admissions Policy for further information.

6.8   Concerns about extremism and radicalisation

6.8.1   Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. See radicalisation and extremism in Appendix 1 for more information. The aim of CONTEST, the UK's counter-terrorism strategy, is to reduce the risk from terrorism to the UK. There are 4 elements of this strategy: Prepare, Protect, Pursue and Prevent. The Counter-Terrorism and Security Act 2015 places specific duties on FE Colleges. These are addressed in the College's separate Preventing Terrorism & Radicalisation Policy.

6.8.2   Some signs a child might be at risk of radicalisation include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

6.8.3   If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger,** contact the police on 999 or the anti-terrorist hotline on **0800 789 321**. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

6.8.4   **The DSL** may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and the Channel programme where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.

6.8.5   Staff and governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link.

6.9   How students can report concerns

6.9.1   In our College, it is essential that students can tell us how they are feeling and know we will take seriously anything they share with us. We aim to create an environment full of 'reachable moments' which encourages students to feel safe enough to open up if they are concerned about something. Students can confidently report any worries they have about their lives, both in and out of College, by:

- speaking to an adult they trust
- reporting bullying or harassment through the HRUC App
- Speaking directly to the HRUC Safeguarding team
- Contacting the Safeguarding team by email or phone

6.9.2   Students are made aware of safeguarding systems in place at induction and throughout the year as part of the tutorial programme. Posters are clearly displayed around all campuses with contact information for the local safeguarding teams at each site. All College ID cards have safeguarding contact information on the reverse.

6.9.3   We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's voice of the child briefing. When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience

6.10   Children on School Link programmes

6.10.1   The College has a duty of care towards children who are studying on a school link programme whilst on College premises. In arranging school link programmes for children of compulsory school age the College will:

- Provide schools with adequate details of provision to enable the school to obtain parental consent for their child to participate. The College will require evidence of this written consent.

- Seek to ensure that for children with special education needs (SEN), they are informed of the details of the statement that has been agreed, in order to determine the level of support needed.

- Request details from the school of any medical needs or requirements a child may have and agree with the school how the necessary support can be provided.

- Ensure that children are made aware of the general standards of safety with which all children and FE college students should comply.

- Inform the school of any safeguarding issues involving a school link student. Request safeguarding information regarding school link students from schools.

- All concerns regarding safeguarding or child protection for students on school link programmes must be referred to a College designated Safeguarding officer and to the Child Protection Officer at the school where the child is on roll (or the child's social worker if the child is not on a school roll).

6.11.   Criminal Record checks for students

6.11.1.   At HRUC students are asked to declare any unspent criminal convictions, cautions, reprimands or final warnings, or any prosecutions pending (including being on bail or released under investigation) as early as possible, i.e. at the point of application or enrolment, or at the point of formal police involvement should the offence occur during the academic year.

6.11.2.   This is part of the College's legal responsibility to provide a duty of care to all staff and students. The declaration of prior convictions or formal police involvement allows the College to review the suitability of admission on an individual basis. All students making a declaration will be interviewed by a Safeguarding Officer or Head of Security. Students with convictions for minor offences will be allowed to continue with the enrolment process, while more serious concerns are referred to an internal risk assessment process. See Admissions policy for more details.

6.11.3.   Should the College become aware of any convictions that were not disclosed at enrolment the College reserves the right to review this student's enrolment and if necessary, suspend or withdraw the student's place at College.

6.11.4.   DSLs will oversee cases where a new Criminal Conviction or police investigation occurs during the academic year. The DSL will be responsible for liaison with other agencies e.g. Police or

children's services as necessary. If any criminal activity is suspected HRUC reserves the right to involve the police and pursue such matters through the legal process.
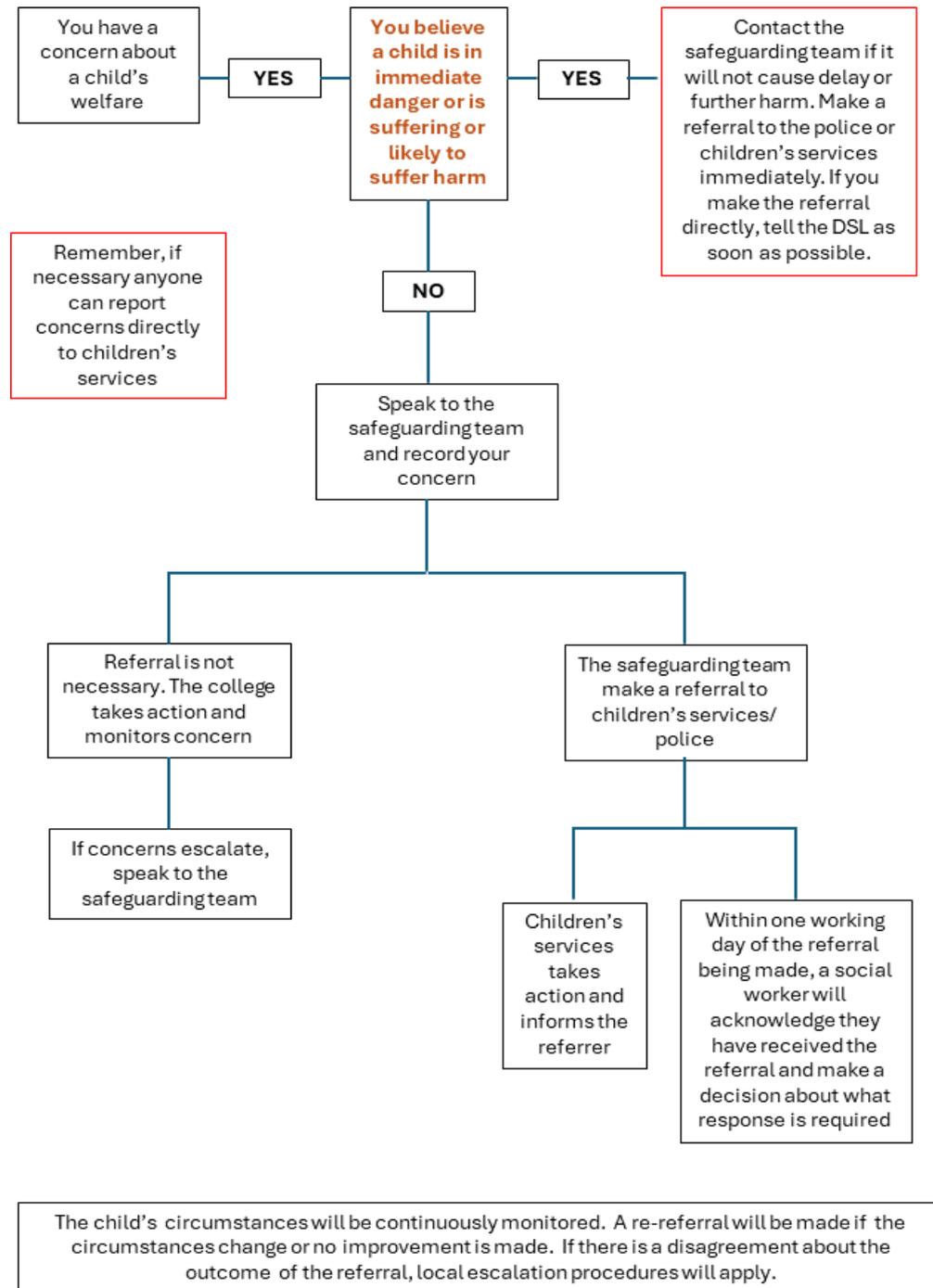
6.11.5.   HRUC will co-operate and not prejudice any police enquiries. Any student involved in alleged criminal activity may be suspended until the outcome of any police enquiry is complete. HRUC reserves the right to withdraw any students whose criminal activity is deemed of such a significant nature that it may place others at risk or bring the College into disrepute. Any failure to co-operate with the police will be taken into account during the College's disciplinary procedure.

6.12   Student exceptional travel

6.12.1.   In the event of a medical or personal emergency, the College may arrange exceptional travel for a student (for example to escort them to hospital in the event of suicidal presentation).

6.12.2.   If the student is under 18 and needs to be provided with exceptional travel (such as a taxi or ambulance) the parent must be contacted. If the parent is not available to accompany the student the parent may give consent for the student to travel on their own, or if consent cannot be obtained the student must be accompanied to their home address or to hospital by two members of staff.

6.12.3.   All students under 18 need to be accompanied to hospital either by two members of staff or a parent/guardian unless permission is given by parents. E.g. if the parents plan to travel directly to the hospital. If members of staff accompany a student to hospital the staff must remain with the student until a parent/guardian arrives or permission is given by the parent/guardian to leave.

6.13   Flowchart: what to do if you have concerns about a child

| You have a concern about a child's welfare | **YES** → | **You believe a child is in immediate danger or is suffering or likely to suffer harm** | **YES** → | Contact the safeguarding team if it will not cause delay or further harm. Make a referral to the police or children's services immediately. If you make the referral directly, tell the DSL as soon as possible. |

Remember, if necessary anyone can report concerns directly to children's services

NO

Speak to the safeguarding team and record your concern

Referral is not necessary. The college takes action and monitors concern

The safeguarding team make a referral to children's services/ police

If concerns escalate, speak to the safeguarding team

Children's services takes action and informs the referrer

Within one working day of the referral being made, a social worker will acknowledge they have received the referral and make a decision about what response is required

The child's circumstances will be continuously monitored. A re-referral will be made if the circumstances change or no improvement is made. If there is a disagreement about the outcome of the referral, local escalation procedures will apply.

7.   Confidentiality

7.1   HRUC takes our responsibility to protect and look after the data (information) we hold about students and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or

- to gain consent would place a child at risk

7.2   The government's [information sharing advice for safeguarding practitioners](#), which includes the seven 'golden rules' for sharing information, supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

7.3   We will share information in a timely manner to keep children safe, which will include sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the College safeguarding team will only share information about a child to members of staff and professionals on a need to know basis.

7.4   All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the student that they may need to pass information on to others who can help and protect them.

7.5   Notifying parents or carers: At HRUC, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated.

7.6   It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

8.   Record Keeping

8.1   Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely, and access will only be given to those who need it. Records will include:

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

8.2   When students leave HRUC and where the student is under the age of 18 and continuing with further education, the College will make sure that their safeguarding file is securely transferred to the new education setting or College in a timely fashion. Where appropriate, the DSL will share information in advance of the student transferring so support can be put in place ready for when the student starts. When a child starts at our College, we will make sure key staff are aware of the safeguarding file as soon as possible.

8.3 If HRUC is the last College that the student attends, their safeguarding file will be securely stored by the College until their 26th birthday is reached, when it will be securely disposed of.

9. Concerns or allegations about adults in our College

9.1 If you have a low-level concern, or an allegation is made, about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the Principal as soon as practically possible. The Principal will liaise with the DSL. This includes any concerns in or out of College, online and/or offline.

9.2 If the low-level concern or allegation is about the Principal, contact the chair of governors, whose details are at the start of this policy.

9.3 If you are unable to report to the Principal or chair of governors, either because they are not available or because you believe that there is a conflict of interest, share your concerns with the relevant local authority designated officer (LADO), whose details are at the start of this policy. Appendix 2 sets out what steps the Principal or chair of governors will then follow if appropriate.

10. Whistleblowing

10.1 A whistleblower is a worker who reports certain types of wrongdoing and all staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. HRUC has a separate whistleblowing policy, which lists the procedures for raising concerns. This is available on the College website and the staff intranet.

10.2 Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call: 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

11. Online safety and the use of smart devices

11.1 This section summarises HRUC's whole College approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in the following policies which can be viewed on the College website and staff intranet:

- BYOD (Bring Your Own Device) Policy
- Code of Practice - Review of IT Security
- Code of Practice - Use of Software
- eSafety Policy
- IT Security Policy
- Student Code of Practice - Use of IT Facilities

11.2 HRUC understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of College life.

11.3   Our aim is to:

- have in place processes about online safety that protect our children and staff, including how we identify, intervene in and escalate any online concerns where appropriate
- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

11.4   We fulfil our aims by:

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices
- educating children to learn how to keep themselves safe when online (using the government's Teaching online safety in schools guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the College rules about online safety
- engaging with parents and carers about what online safety looks like
- making sure our whole College approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement, which covers how they should use the College's IT systems and their mobile and smart technology
- making parents, carers, students and staff aware that staff can search an electronic device they have confiscated, as explained in Searching, Screening and Confiscation - GOV.UK
- ensuring that effective filtering and monitoring is in place with regard to generative AI, as explained in Generative AI: product safety expectations – GOV.UK

11.5   Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

11.6   The 4Cs:

11.6.1.   Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If students or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

11.7   Mobile phones and smart technology:

- Many children have unlimited and unrestricted access to the internet via mobile phone networks, therefore children could be harmed or harm others online when at college. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is as follows.

- Students may bring their personal mobile phones or smart devices to College, however use of phones or smart devices whilst in the classroom environment must be at the discretion of the class teacher (for example if the teacher requires students to use their phones for an aspect of their learning).

- The College's anti-bullying policy includes bullying and harassment that takes place online, and any bullying or harassment will be dealt with under this policy. Students must not take photos or recordings of peers or staff without their explicit prior consent.

11.8   Media recordings, audio, image and video (including digital files):

When we make media recordings of students, such as taking videos or photos, we will get the student's consent, make sure the student is appropriately dressed and encourage the student to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our College's expectations for staff making media recordings.

11.9   Filtering and monitoring

11.9.1.   To limit children's exposure to these categories of risk from HRUC's IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will make sure that:

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our governing body review the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe
- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact on teaching and learning
- filtering works across all devices including mobile phones and smart technology

11.10   Remote education

11.10.1.   When students are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- what their child/ren are being asked to do online, including the sites they will be accessing and who from the College will interact with their child/ren
- the importance of children being safe online and offer advice on how to do so
- what systems our College uses to filter and monitor online use

11.11   Information security and access systems

11.11.1   We have procedures in place to protect our IT systems, staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's <u>Cyber security standards guidance</u>. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

12.   Children potentially at greater risk of harm

12.1   At HRUC, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm and that children can become temporarily vulnerable due to a change in circumstances. The information below highlights some of those groups of children this applies to; however, there are several other groups not listed.

12.2   Children who have a social worker

12.2.1   Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. HRUC recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

12.2.2   Children's services share with us which students have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unexplainable and/or persistent absences from education, which itself can carry additional risks. When necessary, we offer extra in-college support to our students who have a social worker, such as mentoring from a Student Support Officer, counselling, or other targeted additional support.

12.2.3   The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our College works with the Virtual School to support these children.

12.2.4   The site DSLs have designated responsibility for support students who have or who previously had a social worker. Their contact information can be found in <u>section 3</u> of this policy.

12.3   Children looked after and previously looked after

12.3.1   These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse, neglect and/or exploitation. HRUC will ensure that staff have the necessary skills and knowledge to keep children looked after, and previously looked after, safe. All staff will have the skills and knowledge to keep these children safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The is a Designated Member of Staff at each college within the group who takes responsibility for promoting the educational achievement of children looked after/ previously looked after. The designated governor for children looked after is the safeguarding link governor.

12.3.2   The guidance [Designated teacher for looked-after and previously looked after children](#) (non-statutory for Further Education settings) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the College has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child.

12.4   Children with special educational needs, disabilities and health issues

12.4.1   Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support students who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse/ neglect/ exploitation. Our safeguarding curriculum, i.e. the ways we teach students to keep themselves and others safe, is adapted to meet the needs of students with SEND.

12.4.2   HRUC is aware that children with SEND, or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

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

12.4.3   We offer additional support for these students, which includes:

- Specialist pastoral support
- Targeted social groups and extra-curricular activities
- Referral to specialist mental health support services

13.   Identified areas of particular risk for our College

13.1   At HRUC we are mindful of the contextual safeguarding risks that our students may experience. This includes risks outside the home, for example in the community, within peer groups, on public transport, or in the area local to the College sites. In order to mitigate and manage risk the College shares information with the Safer Schools Police team and has an information sharing agreement in place to this effect. The College will also share information regarding risk trends or incidents of note with the local authority contextual safeguarding team. HRUC also works closely with our local Safer Neighbourhood Police teams to ensure that any risks are managed swiftly and effectively.

14.   Lettings and off-site arrangements

14.1   The HRUC Lettings Policy can be viewed on the College website and staff intranet. When services or activities are provided by the governing body, under the direct supervision or management of our College staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our College premises to other organisations or individuals, such as community groups, sport associations and extra-curricular activities

providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are students at our College.

14.2   To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that they complete the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our College on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

14.3   Extended College and off-site arrangements

14.3.1   Where extended College activities are provided by and managed by the College, our own safeguarding and child protection policy and procedures apply. When our students attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place. This is further covered in the HRUC Outdoor Education Visits policy.

14.4   Work experience, work placements and volunteering

14.4.1   Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. Any students intending to undertake work experience in Health, Care or Early Years sectors will need to have an enhanced DBS check before starting on their placement.

14.4.2   The College will satisfy itself that an employer has assessed the associated risks to workers under 18 on their premises and has suitable and sufficient risk management arrangements in place. Any checks will be kept in proportion with the risk environment. For low-risk environments, assurance can be gained through a conversation with the employer. Students who are placed with employers will be given clear advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse/ neglect/ exploitation.

14.4.3   For volunteering activities the following arrangements apply: if the College is the main organiser (or significant partner) of a volunteering event and the activity is part of the timetabled study period then a risk assessment of the event or activity will need to be undertaken. In this case the College's DBS policy and public liability insurance should apply.

14.4.4   If the College is signposting students to a volunteering opportunity which is outside of the timetabled study period, and not organised by the College, then a risk assessment will not be undertaken by the College. The College will not normally request documentation such as DBS from organisations offering volunteering opportunities. However, HRUC endeavours to use registered charities for its signposting. When the College is signposting to organisations that are not registered then appropriate checks for safeguarding will be made.

15.   Training

15.1   Designated safeguarding lead

15.1.1   The designated safeguarding lead will attend regular training to prepare and assist them in leading the College's safeguarding response and approach. Additional training or research may

be required as local, or College specific safeguarding issues arise. Minimally, the designated safeguarding lead will:

- attend the level 3 multi-agency local safeguarding partnership training within 12 weeks of starting this role and refresh these every two years
- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the local safeguarding children partnership by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend harmful sexual behaviour and Prevent awareness training
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the College's filtering and monitoring systems work and how they can be best used to keep children safe at HRUC

15.2   Governors

15.2.1   All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the College's procedures and policies, making sure they are working as they should. The training will be regularly updated. Further,

- The governing body will make sure the designated safeguarding lead has the time and resources to attend training.
- The chair of governors will receive training about managing allegations against the Principal to assist them in the eventuality that an allegation is made.
- The governing body will make sure that online safety is a theme in all staff safeguarding training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The link safeguarding governor will make sure that staff and governors attend safeguarding training at induction and regularly after that. The link safeguarding governor will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

15.2.2   The governing body will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. HRUC has a separate safer recruitment policy, which explains what safeguarding checks are completed before employment to make sure those who work with children are suitable. This is further covered in the HRUC Safer Recruitment and DBS policies.

15.3   All staff

15.3.1   Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive the following training:

- Level 1 safeguarding and child protection training (including online safety) and Prevent awareness training at induction. The training is regularly updated and reflects the whole College approach to keeping children safe.
- An additional Level 2 safeguarding training is also delivered to permanent staff and governors as part of a rolling internal CPD programme.

15.3.2   Safeguarding and Prevent training will be refreshed every 2 years (either online or face-to-face).

15.3.3   All Safeguarding Officers must attend Local authority 'Working Together' Level 3 training. DSLs will refresh this training every 2 years.

15.3.4   In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

15.3.5   Our training ensures that staff:

- can spot the signs of possible abuse, neglect or exploitation
- know the College's safeguarding procedures and their role in carrying them out
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this information confidentially
- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised and how to challenge extremist ideas
- understand what cyber security the College has in place to keep students and staff safe when online at College and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children

15.3.6   We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our College's safeguarding procedures, and have received appropriate safeguarding training.

15.3.7   The Principal will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

15.4   The designated member of staff for children who are looked after (CLA)

15.4.1   We follow the Role and responsibilities of the designated teacher's government guidance (non-statutory for Further Education colleges). There will be a designated member of staff for CLA at each College site. The designated member of staff (and any deputies) will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with relevant Virtual Schools, accessing their training and forums to stay up to date.

16.   Teaching and Learning

16.1   At HRUC, we aim to prevent our students from coming to any harm. We recognise how important it is that we teach and role-model to students how to keep themselves and others safe. Our curriculum meets the needs of all students, such as students with SEND and students who have been abused/ neglected/ exploited.

16.2   Students will be informed of the safeguarding practices in the College and specifically where and whom they can go to for help. Students will be made aware of possible risks to their safety, including e-safety, through induction and tutorial, and in the course of studying in the College, with the intent that they are better able to protect themselves from potential harm. The tutorial scheme of work will include topics such as those included in this policy.

16.3   At times the College may promote awareness of safeguarding through external speakers or events which are used to highlight a particular issue and promote understanding and debate amongst learners.

16.4   The College will ensure that parents have an understanding of the responsibility placed on the College and staff for safeguarding and child protection by placing this policy on its website and setting out its obligations in corporate publications. The College will also share information with parents by email on particular safeguarding topics, events or activities throughout the year.

16.5   If specific safeguarding issues arise during the College year, the Principal will make sure the tutorial curriculum is adapted to cover current issues.

17.   Linked policies

17.1   This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the below policies:

- Code of Conduct
- Physical intervention Policy
- Harassment and Anti Bullying Policy
- Safer recruitment and selection
- Whistleblowing Policy
- Procedure for managing allegations against staff (including low-level concerns)
- Health & Safety Policy
- Attendance & Punctuality Policy
- Study Programmes Strategy
- Administration of Medication and Safe Storage of Prescribed Medication Policy
- Disclosure Barring Service Policy

18.   Appendix 1: Types of abuse and specific safeguarding concerns

18.1   This section is based on Annex B of KCSIE. Annex B includes further information about other safeguarding issues to be aware of. All concerns under this section should be addressed in line with the section 6 of this document, unless stated otherwise.

18.1.1   **Abuse** is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

18.1.3   **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- communicating to a child that they are worthless or 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 being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another, such as in situations of domestic abuse
- serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

18.1.4   **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

18.1.5   Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

18.1.7   Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

18.1.8   We use the following guidance to help identify and address cases of neglect.
Handling Cases of Affluent Neglect in Schools
London partnership guidance

18.1.9   **Exploitation** is a form of abuse where a child is used for financial gain, sexual gratification, labour or personal advantage. Exploitation takes a number of different forms, and perpetrator may subject children to multiple forms of abuse, such as criminal and sexual exploitation. It can involve force or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

18.1.10   Further information: Child sexual exploitation: definition and guide for practitioners

18.2   Indicators of abuse

18.2.1   The following list, provided by the NSPCC, covers some common indicators of abuse, neglect or exploitation:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- patterns of repeated lateness or absence

18.2.2   **It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

18.3   Specific safeguarding concerns

18.3.1   This section is based on Annex B of Keeping Children Safe in Education 2023. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the section 6 of this document, unless stated otherwise.**

18.4   Children absent from education

18.4.1   All staff will be aware that children missing from education or absent persistently, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse

or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

18.4.2   Attendance is closely monitored at HRUC to support us in identifying abuse, neglect and exploitation and acting early. Our staff will be aware of our College's unauthorised absence procedures and children missing education procedures. We notify children's services if a child who has a social worker is absent from College without a suitable explanation. We endeavour to have more than one emergency contact number for each student, which supports the College's procedure for addressing children who have unexplainable and/or persistent absences from education.

18.4.3   Our attendance policy and procedures are set out in a separate document, which can be found here.

18.5   Contextual safeguarding

18.5.1   Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, education settings and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

18.5.2   HRUC will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with the contextual safeguarding teams in the relevant local area. If there is a specific concern about a child, we will consult with the relevant children's services.

18.5.3   Useful links: Tackling Child Exploitation multi-agency Practice Principles

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

18.6.1   We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

18.6.2   Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

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

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being

- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss education or do not take part in education.

18.6.4   Child sexual exploitation (CSE)

18.6.5   CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

18.6.6   CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

18.6.7   CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

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

18.6.8   HRUC follows the London Child Protection Procedures regarding sexual exploitation. Further information on signs of a child's involvement in sexual exploitation is available in Home Office's Child sexual exploitation: definition and guide for practitioners.

18.6.9   Child criminal exploitation (CCE)

18.6.10   At HRUC, we recognise children involved in CCE are victims, despite their engagement in crime. A child may still have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

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

18.6.12   CCE can include children being forced and/or manipulated:

- to work in cannabis factories
- into moving drugs or money across the country (county lines)
- to shoplift or pickpocket
- to threaten serious violence to others
- into committing vehicle crime

18.7   Serious violence

18.7.1   Staff at HRUC will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

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

18.7.2   All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

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

18.7.3   Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

18.7.4   Useful links:
            Preventing youth violence and gang involvement government guidance
            Criminal exploitation of children and vulnerable adults: county lines government guidance

18.8   College-related weapons incidents

18.8.1   HRUC will inform children's services and the police of any incident involving a weapon or potential weapon. Our staff have the legal power to search students without consent for a number of 'prohibited items', including weapons covered in the government's Searching, screening and confiscation guidance.

18.8.2   HRUC recognises that children and young people involved in college-related weapons incidents, including the person displaying the behaviour, are vulnerable. HRUC will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons. The College is committed to working with and sharing information with its partners such as the local police and safer schools officers, YOT teams, LSCPs, and the local authority safer neighbourhood teams, to protect and educate students. The College actively works with Harrow, Hillingdon and Richmond local authorities to understand local strategies and contribute to a multi-agency response.

18.9   Children who run away or go missing from education, home or care

18.9.1   HRUC recognises that children who run away, go missing or are absent from their place of education or normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

18.9.2   When necessary and in conjunction with the relevant local authority, HRUC will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the College site for the interview to take place. We will follow the London Safeguarding Children Partnership's Missing children procedure when required.

18.10   Mental health

18.10.1   With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. HRUC recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

18.10.2   Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. HRUC aims to promote positive mental health for all staff and students. To do so, we take into account the government's Mental health and behaviour in schools guidance.
Our Senior mental health leads are:
Harrow: Lee Janaway
Richmond: Lorna Edwards
Uxbridge: Sharon Croxon

18.10.3   HRUC has a wide range of resources and support for students experiencing mental ill-health including counselling provision, signposting to partner agencies for targeted support, preventative activities and workshops, and online support service signposting.

18.10.4   Useful links:
Mind
NSPCC: Child mental health

18.11   Domestic abuse

18.11.1   Domestic abuse can include a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

18.11.2   These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

18.11.3   HRUC has signed up to the police initiative Operation Encompass, a system which ensures that when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, the police will inform the DSL before the child or children arrive at College the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

18.11.4   Useful link:
          London safeguarding partnership guidance

18.12   Homelessness

18.12.1   HRUC recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

18.12.2   Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

18.13   Child-on-child abuse

18.13.1   We recognise that children can abuse or exploit other children, often referred to as child-on-child abuse. It can happen inside and outside college and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

18.13.2   Older students may use any of these types of child-on-child abuse to 'recruit' younger students into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual or criminal exploitation first hand may be forced to recruit other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

18.13.3   HRUC does not tolerate child-on-child abuse. We know that even when there are no reported cases of child-on-child abuse, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For students to feel safe at our College, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

18.13.4   It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole College response to abuse, makes sure everyone knows how to behave and how to respond consistently when students show unacceptable or abusive behaviour.
- In all areas of College life, such as lessons, enrichment activities and tutorials, we teach students how to act and to treat other people, including when they are online.
- We have effective systems in place for students to report child-on-child incidents including in person to a trusted adult, by email to the safeguarding team at their College campus or using the HRUC app reporting tool.

18.14   Child-on-child sexual violence and sexual harassment

18.14.1   Our College is aware of Ofsted's Review of sexual abuse in schools and colleges. The review was carried out as a result of the large amount of testimonies shared on the Everyone's Invited website, which highlighted the prevalence of sexual harassment and sexual violence.

18.14.2   We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exist on a continuum and may overlap. They are never acceptable, and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports do not mean it is not happening here at HRUC.

18.14.3   Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:
- children with SEND
- students who are LGBT or who are perceived to be LGBT by their peers

18.14.4   Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school or college. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

18.14.5   We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the College maintaining a culture of safeguarding.

18.14.6   HRUC follows Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

18.15   Harmful sexual behaviours (HSB)

18.15.1   Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. HRUC recognises that students displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

18.15.2   When considering HSB, we will take into account the ages and the stages of development of the children/ vulnerable adults. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse or exploit an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

18.15.3   Our DSL and deputies will:

- have a good understanding of HSB
- assist in planning the tutorial curriculum aimed at preventing HSB
- ensure staff spot and report inappropriate behaviour to prevent an escalation
- incorporate our approach to sexual violence and sexual harassment into the whole College approach to safeguarding

18.15.4   HRUC's tutorial curriculum addresses these issues via the following topics according to the age and stage of development of our students:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

18.15.5   Useful links:
London safeguarding partnership guidance
NSPCC Harmful Sexual Behaviours
Stop it Now
Shore Space

18.16   Upskirting

18.16.1   HRUC will ensure that all staff and students are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

18.16.2   HRUC will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

18.17   Sharing nudes and semi-nudes

18.17.1   This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). Alternative terms used by children and young people may include 'dick pics' or 'pics'. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. while sharing nudes and semi-nudes of them or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

18.17.2   Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

18.17.3   We are aware of and in response to incidents will use the alert guidance and support provided by the National Crime Agency and CEOP

18.18   So-called 'honour'-based abuse, including FGM and forced marriage

18.18.1   So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

18.19   Female genital mutilation (FGM)

18.19.1   Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

18.19.2   **Section 6 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.**

18.19.3   Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from College.
- A girl struggles to keep up in College.
- A girl runs away – or plans to run away - from home (NSPCC)

18.19.4   Signs FGM might have taken place:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school or college
- reluctance to go to the doctors or have routine medical examinations
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed (NSPCC)

18.19.5   Useful information:

Female Genital Mutilation Statutory Guidance
London safeguarding partnership guidance

18.20   Forced marriage

18.20.1   A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

18.20.2   An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

18.20.3   We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

18.20.4   Useful information:
Freedom charity
Handling cases of forced marriage guidance
National FGM Centre

18.21   Modern slavery

18.21.1   Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

18.21.2   Common places modern slavery occurs includes:

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

18.21.3   Victims can be forced into criminal activities such as cannabis production, theft or begging.

18.21.4   The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

18.21.5   Useful information:
[Modern slavery: how to identify and support victims](#)

18.22   Private fostering

18.22.1   A private fostering arrangement is when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

18.22.2   HRUC is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

18.22.3   Useful links:
[Looking after someone else's child](#)
[London safeguarding partnership guidance](#)

18.23   Preventing radicalisation and extremism

18.23.1   While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

18.23.2   **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

18.23.3   **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

18.23.4   **Terrorism** is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

18.23.5   The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

18.23.5   To prevent children from being radicalised into terrorism, we make sure:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Students are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.

- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- We perform a risk assessment which assesses how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

18.23.6   The Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

18.23.7   **If you have concerns that a student may be at risk of radicalisation or involvement in terrorism, go to section 6.**

18.23.8   Useful links:
London safeguarding partnership guidance
Protecting children from radicalisation: the prevent duty
Managing risk of radicalisation in your education setting

18.24   Child abuse linked to faith or belief

18.24.1   This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

18.24.2   If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

18.24.3   Useful links:
Metropolitan Police advice
Short Youtube introduction video

18.25   Fabricated or induced illnesses

18.25.1   Staff at HRUC are alert to the issues surrounding fabricated or induced illnesses. Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Concerns that a child's illness may be fabricated or induced are most likely to come from health professionals. However, College staff may notice where a child is frequently absent from College on questionable health grounds. Normal safeguarding procedures apply in these circumstances.

18.25.2   Useful link: The Royal College of Paediatrics and Child Health (RCPCH) guidance

19.   Appendix 2: Allegations against staff and low-level concerns procedure

19.1   HRUC has a whole College approach to safeguarding and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Despite all efforts to recruit safely, there may be occasions when allegations of abuse against children are reported to have been committed by staff, supply staff, practitioners and/or volunteers, who work with students in our College.

19.2   An allegation is any information which indicates that a member of staff, supply staff or volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

19.3   This applies to any child that the member of staff, supply staff or volunteer has contact with in their personal, professional or community life, as if they had child protection concerns raised for their own children.

19.4   To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, HRUC's code of conduct, Dignity at Work and in the Learning Environment Policy and the 'Guidance for safer working practice for adults who work with children and young people in education settings' Guidance for safer working practice for those working with children and young people in education settings February 2022

19.5   Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction. All staff should be aware of HRUC's behaviour policy. All College staff should take care not to place themselves in a vulnerable position with a student. It is always

advisable for interviews or work with individual students or parents to be conducted in view of other adults.

19.6 We understand that a student may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or being aware of the information, will immediately inform the Principal or the DSL.

19.7 On all such occasions, the Principal or the DSL will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

19.8 If the allegation made to a member of staff concerns the Principal or CEO, the person receiving the allegation will immediately inform the chair of governors who will consult the LADO as above, without notifying the Principal/CEO first. Contact details for the chair of governors can be found in section 2 of this policy.

19.9 Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home
- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people

19.10 HRUC will follow the London child protection procedures for managing allegations against staff [London child protection procedures: allegations](#) and procedures set out in [Keeping Children Safe in Education 2025](#)

19.11 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and the Principal and DSL will seek the advice of the LADO and an HR consultant in making this decision. All options to avoid suspension will be considered. In the event of an allegation against the Principal/ CEO, the decision to suspend will be made by the chair of governors in consultation with the LADO and HR.

19.12 If the allegation is regarding supply/ agency staff, the College will ensure that allegations are dealt with properly. In no circumstances will the College cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The College will discuss with the agency whether it is appropriate to suspend the supply worker, or redeploy them to another part of the College, while they carry out their investigation.

19.13 If an allegation pertains to another adult not employed directly by the College, for example catering staff, cleaning staff, sports coaches or a former member of staff, the College will work directly with the employing agency and the LADO as described above.

19.14 If an allegation pertains to an incident that happened when an individual or organisation was using College premises for the purposes of running activities for children (for example

community groups, sports associations, or service providers that run extra-curricular activities) the College will follow procedures as set out in section 14 above, including informing the LADO.

19.15   We will ensure that all external agencies used are provided with details of the College's process for managing information. We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

19.16   Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

19.17   There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity* has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. If a teacher is dismissed due to serious misconduct, or might have been dismissed had they not left first, consideration will be given as to whether to refer the case to the Secretary of State via the Teaching Regulation Agency.
*The definition of Regulated Activity is taken from KCSIE 2025 Annex E

19.18   **Low-level concerns:** The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on staff's personal mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door where this is not part of usual working practice (for example, counselling sessions will take place in a 1:1 setting).
- using inappropriate sexualised, intimidating or offensive language.

19.20   Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

19.21   The culture of our College is such that staff are encouraged to pass on low level concerns to the DSL or the HR department. These concerns will be recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of the College from potential false allegations or misunderstandings.

19.22   Records of low-level concerns will be maintained and monitored by the HRUC HR department.

20.   Appendix 3: Dealing with incidents of harassment and sexual misconduct

20.1   This Appendix is intended to provide a single comprehensive source of information which sets out policies and procedures relating to incidents of harassment and sexual misconduct, including intimate personal relationships between staff members and students. At HRUC we are aware of the Office for Students condition of registration E6 which requires this information to be published and accessible to all students.

20.2   An 'incident' of harassment and/or sexual misconduct includes a wide range of circumstances. For example, it includes, but is not limited to, allegations, complaints, suspected behaviour, and formal findings of harassment and/or sexual misconduct. It can take place between staff and other staff, students and other students, or staff and students, and can happen online and/or in person. It also includes instances where a formal complaint is not made, or where there is insufficient evidence to progress to disciplinary proceedings.

20.3   Child-on-child abuse, including sexual violence and sexual harassment are covered within section 6 of this policy.

20.4   It is not acceptable for a member of staff to form an intimate personal relationship with any college learner, regardless of the learner's age or mode of study. It is an abuse of trust for a member of staff aged 18 or over to have an intimate relationship with a person under 18 who is a student of the College. This is a criminal offence under the Sexual Offences Act 2003.

20.5   As a result of their knowledge, position and/or the authority invested in their role, all adults working at the College (paid or unpaid, employed directly or through an agency) are in positions of trust in relation to the students in their care. A relationship between a member of staff and a student cannot be a relationship between equals. As there is potential for exploitation and harm, staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with the potential to be misinterpreted.

20.6   As well as the requirement that positions of trust are not abused in relation to students, whatever their age, where a person aged 18 or over is in a position of trust with a student under 18, it is a criminal offence for that person to engage in any sexual activity with or in the presence of that student, or to cause or incite that student to engage in or watch sexual activity. This means that staff should not:

- use their position to gain access to information for their own advantage and/or a student or family's detriment
- use their power to intimidate, threaten, bully, coerce or undermine students
- use their status and standing to form or promote relationships with students which are of a sexual nature.

20.7   Staff should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a student seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his/her professional judgement in making a response and be aware that such social contact could be misconstrued.

20.8 This is further covered within the HRUC Code of Conduct, Staff Handbook, and Dignity at Work and in the Learning Environment policies.

20.9 HRUC will provide support to students who report harassment and sexual misconduct, including incidents that are reported to happen both on or offline, or where the incident took place outside of the college context (e.g. an incident involving an individual that is neither staff nor student of the college). HRUC seeks to support any student who experiences harassment or sexual misconduct even if this takes place outside of the provider context.

20.10 HRUC collects and monitors data relating to the prevalence of harassment and/or sexual misconduct affecting students, including data about reporting (such as the number and type of incidents) in order to inform effective action to protect students from behaviour that may amount to harassment and/or sexual misconduct. We encourage Student Voice, and seek to understand students' particular experiences of harassment and sexual misconduct in order to determine the steps that may be needed to protect our students from harm.

21. Appendix 4: Apprenticeships

21.1 When an apprentice is in the work-based learning environment the employer has the primary responsibility for the health and safety of the apprentice and should be managing any significant risks. As the training provider, the College takes reasonable steps to satisfy itself that the employer is doing this, including:

- Pre-placement Health & Safety/Risk assessment checks of employers prior to placement of learners on apprenticeships is conducted.
- Verifying workplace's valid Employer Liability Insurance
- Implementing an 'action plan' if a learner is placed with employer in a high-risk placement.
- Quarterly audits to ensure health and safety checks are in place
- Ensuring employers are aware of their contractual duty to fulfil their responsibilities for safeguarding in accordance with relevant legislation and to inform the College of any concerns regarding student safeguarding (including absences).

21.2 For learners the following is provided to make them aware of safeguarding:

- A learner Induction with focus on Prevent, Safeguarding, EDI and Health and Safety in the Workplace.
- Specific training on certain equipment, such as high risk machinery may be conducted in workshops, however it remains the responsibility of the employer to ensure safe practice and appropriate training in the workplace.
- Learners are issued with information identifying who to contact if they are worried about their own safety/ wellbeing or have a concern they want to raise.
- Progress reviews provide an opportunity for apprentices and employers to reflect on any safeguarding issues (alongside H&S and EDI good practice). Any concerns identified during a progress review or standard assessment will be reported to the relevant staff member within the College.

21.3 For further information please refer to the HRUC Procedures for the Management of Work Based Learning policy.