

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

*This College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.*

**Date approved by College Executive:** September 2025

**Date approved by the Trustees:** September 2025

**Status:** Statutory

**Review period:** Annual

**Next review date:** September 2026

**Designated Safeguarding Lead:** Helena Clarke and Sophie Mngoma

**Deputy Designated Safeguarding Leads:** Laura Olrod, Anne Jackman, Laura Thomas, Victoria Wood, Samad Naheem, Jade Douthwaite and Emily Driscoll.

**Safeguarding Trustee:** Anne Middleton

**Principal:** Brett Freeman

**Chair of Trustees:** Tim Stokes

## POLICY STATEMENT

This Policy applies to anyone working on behalf of Woking College including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students. Its purpose is to protect and enhance the safety and well-being of all children and young people by actively promoting awareness, good practise and sound procedures.

We believe the safety and well-being of children and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We fully recognise our statutory responsibility for safeguarding: the safety, protection and well-being of all children and young people that Woking College supports and interacts with, is paramount and has priority over all other interests. This includes responding immediately and appropriately where there is a suspicion that any young person under the age of 18 years old may be a victim of bullying, harassment, abuse (including physical, sexual, emotional) or neglect.

‘Young Person’ means those under 18 years old including all of those up to their 18<sup>th</sup> birthday – as designated a ‘child’ within the terms of the Children’s Act 1989.

Woking College encourages a culture of listening to and engaging in dialogue, with children seeking their views in ways that are appropriate to their age, culture and understanding.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England including [Keeping children safe in education 2025](#) the [Children Act 1989](#) (and [2004 amendment](#)), and “Working Together to Safeguard Children 2023” [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#) which provides the key statutory guidance for anyone working with children and young people.

All procedures and policies pertaining to safeguarding are regularly reviewed and updated on an annual basis.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the College’s Safeguarding Policy, and reference to it in our Parent/carer Handbook and on the website.

The name of the designated members of staff for Safeguarding will be clearly advertised in the College.

All new members of staff will be given a copy of the Safeguarding Policy, with the DSLs and Deputy DSLs' names clearly displayed, as part of their induction into the College.

The policy is available publicly on the College website and via hard copy from the main office.

The aims of the policy are: -

- To promote an environment that is safe, where staff and students treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff of the need to safeguard young people and vulnerable adults and of their rights and responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of supporting young people and vulnerable adults known or thought to be at risk of harm, and ensure we, the College, contribute to assessments of need and support packages for those students.
- To ensure that relevant information about a young person or vulnerable adult at risk of harm is disseminated to appropriate staff within the College on a 'need to know' basis.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured College Procedure which will be followed by all members of the College staff in cases of suspected abuse.
- To support the development of effective working relationships with other agencies, particularly the Police and Children's Services.
- To ensure that all relevant policies and procedures within the College are linked to, and comply with, the Woking College Safeguarding Policy and Procedures.
- To support young people's and vulnerable adults' development in ways that will foster security, confidence and independence and to promote this through the curriculum, the pastoral programme and the Student Union.
- To ensure that all staff working with our young people who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory Disclosure & Barring Service (DBS) check (according to guidance) and a central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance last updated 31<sup>st</sup> August 2018.

## DEFINITIONS:

For the purposes of the Safeguarding Policy:

- **Safeguarding** and promoting the welfare of children is defined as:
  - protecting children from maltreatment;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
  - taking action to enable all children to have the best outcomes.
- **Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- **Early Help** means providing support as soon as additional needs and support emerge at any point in a child's life.
- A **'child or young person'** means any person under the age of 18 (i.e., those who have not yet reached their 18th birthday).
- A **'vulnerable adult'** means any person " who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
- **'Staff'** means all employees, full-time and fractional, and all agency, franchise, contract and volunteer staff working for the College.
- **'Parents/carers'** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.
- **'Social Care'** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.
- **'C-SPA'** refers to the Children's Single Point of Access and the Child Protection Consultation Line.
- **RFS** refers to the Request for Support from Surrey Safeguarding Children's Partnership
- **MAP** refers to the multi-agency partnership
- **CPOMS** refers to the safeguarding software used by the College to record, monitor and analyse safeguarding incidents.

## ROLES AND RESPONSIBILITIES:

### TRUSTEES:

All trustees understand and fulfil their responsibilities, namely to ensure that:

- There is a Safeguarding and Child Protection policy together with a Staff Code of Conduct.
- The College operates Safer Recruitment Procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training and disqualification by association regulations.
- The College has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.

- Online safety is a running and interrelated theme whilst devising and implementing the College's approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- A senior leader has Lead Designated Safeguarding Lead (DSL) responsibility.
- On appointment, the DSLs and DDSs undertake interagency training (Surrey Safeguarding Modules 1&2) and also undertake DSL 'New to Role' and the 'Update' Course every two years.

(More information can be found here; [Training - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://surreyscp.org.uk))

- All other staff have Safeguarding training at induction and updated as appropriate (and at least annually).
- Trustees should ensure that all trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole
- Woking College will work in accordance to guidance and good practice from the Surrey Safeguarding Children Partnership. More information can be found at: [Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://surreyscp.org.uk)
- Any weaknesses in Child Protection are remedied immediately.
- The Chair of Trustees is nominated to liaise with the Local Authority (LA) on Child Protection issues and in the event of an allegation of abuse made against the Principal.
- Child Protection policies and procedures are reviewed annually and that the Safeguarding policy is available on the College website or by other means.

## SENIOR LEADERS:

- The Principal will ensure that policies and procedures, adopted by the Board of Trustees and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- At least two members of the Senior Leadership team will have complete Safer Recruitment Training.
- The Principal will ensure that Safeguarding concerns or allegations against adults working in the College are referred to the LADO for advice, and that any member of staff found not suitable to work with children will be notified to the Independent Safeguarding Authority for consideration for barring, following resignation, dismissal, or in the case of a volunteer, when we cease to use their service as a result of a substantiated allegation.
- The Designated Safeguarding Lead (DSL), the Assistant Principal Support for Learning and Wellbeing **Helena Clarke**, is a member of the Senior Leadership Team and takes lead responsibility for child and vulnerable adult protection and receives appropriate training and support and adequate resources to carry out this role.

## DESIGNATED SAFEGUARDING LEAD:

The Designated Safeguarding Lead is responsible for:

- Referring a child if there are concerns about possible abuse, to the Children's Services Area Team, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call using the Request for Support Form (RFS).
- Ensuring the College fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- Ensuring that all members of staff/ volunteers have timely and relevant safeguarding training.
- Keeping written records of concerns on CPOMS about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from general students records/ main files, until the child's 25th birthday, and are copied on to the child's next school or college (if they are under 18 at the time of progression).
- Ensuring that an indication of the existence of the additional file is marked on the student's main file.
- Liaising with other agencies and professionals.
- Ensuring that either they or the appropriate staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- Holding the lead responsibility for safeguarding and child protection (including online safety) in the College, this responsibility is not able to be delegated.
- Ensuring that online filtering and monitoring systems are in place, are regularly checked and that any alerts are actioned appropriately.
- Having an "it could happen here" approach to safeguarding.
- Referring cases where there is a radicalisation concern following the Prevent referral process and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk)
- Referring cases where a crime may have been committed to the Police as required.
- Following DfE and KCSIE guidance 'Peer on Peer Abuse' when a concern is raised that there is an allegation of a student abusing another student within the College.
- Following KCSIE guidance on contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families.
- Being available during term time (during college hours) for staff in college to discuss any safeguarding concerns.
- Meeting all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2025.

## SAFEGUARDING TEAM:

The College Safeguarding Team work under the supervision of the Designated Safeguarding Lead and will also lead on the implementation of this policy in the areas of the College for which they have responsibility. The Safeguarding Team includes the following pastoral managers:-

- Assistant Principal Support for Learning and Wellbeing – **Helena Clarke (DSL)**
- Associate Director Pastoral - **Sophie Mngoma (DSL)**
- Head of Year Level 2 - **Laura Olrod (DDSL)**
- Head of Year 12 – **Laura Thomas (DDSL)**
- Head of Year 12 – **Samad Naheem (DDSL)**
- Head of Year 12 – **Jade Douthwaite (DDSL)**
- Head of Year 13 – **Victoria Wood (DDSL)**
- Head of Year 13 – **Anne Jackman (DDSL)**
- Head of Year 13 – **Emily Driscoll (DDSL)**
- Student Wellbeing Co-ordinator – **Lorraine Somersall-Weekes (DDSL)**

These officers have undertaken compulsory training delivered through the Surrey Safeguarding Children Partnership or through an approved external training provider. DSL/DDSLs upon appointment will undertake the DSL 'New to Role' training followed by biannual updates.

Additional information on how to contact the relevant member of staff relating to a safeguarding concern can be found in **Appendix 1**.

## ALL STAFF:

- All staff have a duty to safeguard students and a responsibility to keep themselves up to date with the latest guidance. All staff and trustees have child protection awareness training, updated by the DSL/DDSL as appropriate, to maintain their understanding of the signs and indicators of abuse and reporting concerns.
- All members of staff, volunteers and trustees know how to respond to a student who discloses abuse. Advice for staff when managing a disclosure is given in **Appendix 2**.
- All staff should familiarise themselves with the **Woking College Safeguarding Guide** which gives detailed information on different Safeguarding issues and types of abuse including what to look out for in terms of risky behaviours and concerns. This includes detailed information on types of peer-on-peer abuse and indicators of abuse.
- All staff should know who the DSL is and who the rest of the College Safeguarding team are, in order to make contact with any safeguarding concern. **All staff are expected to contact either Helena Clarke or one of the Safeguarding Team for advice, when necessary, or to make referrals.** A flow chart illustrating the referral process is available in **Appendix 4**.

## REPORTING PROCEDURES:

Disclosure or evidence for concern may occur in a number of ways including a comment made by a child, physical evidence such as bruising, a change in behaviour or inappropriate behaviour or knowledge.

In all cases it is vital to take every action which is needed to safeguard the child, children and young person(s).

### Following a report of concerns the DSL must:

- Use the Surrey Effective Family Resilience – Levels of Need to decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate.
- Normally the College should try to discuss any concerns about a child's welfare with the family and where possible to seek their consent before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
- If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA by sending a Request for Support Form (RFS) by email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA on 0300 470 9100. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify C-SPA of the occurrence and what action has been taken.
- If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA helpline (number as above) to discuss concerns.
- If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider referral to Early Help services.
- Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.

- When a child is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
- The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware. See **Appendix 3 – definitions of Harm and indicators of abuse** for more information on this procedure.
- The DSL/DDSL will be responsible for informing the employee who reported the disclosure of any action taken and any outcome if this is appropriate.
- It is also the responsibility of the DSL/DDSL to ensure any partner agencies involved with the young person are made aware of the disclosure and the action taken where relevant and where information sharing guidance permits this.
- It is important to remember that often only when information held by a number of workers is put together, that a picture of child abuse emerges. All staff & volunteers must adhere to the information sharing protocol published by HM Government, adopted by the Children's Trust and endorsed by SSCP. Details can be found here; [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/622222/information-sharing-advice-for-practitioners.pdf). In addition to this, whilst respecting cultural differences, the basic requirement for children is that they are kept safe across social, ethnic and cultural boundaries.

## CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT

- All staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child sexual violence and sexual harassment and know how to identify it and respond to reports.
- All staff should understand, that even if there are no reports in College, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse, they should speak to Helena Clarke or Sophie Mngoma (DSLs) and log their concerns on CPOMS.
- All staff are expected to challenge inappropriate behaviours between peers, which are actually abusive in nature to ensure that we actively fight against the normalisation of a culture of sexual violence and harassment.
- All staff should familiarise themselves with the detailed information on types of child-on child sexual abuse and sexual harassment and indicators of abuse in the **Woking College Safeguarding Guide** and should use this guide to help them identify and refer any concerns related to child-on child sexual abuse and sexual harassment.

### Reporting process for Child-on-child sexual abuse and sexual harassment:

- All concerns raised by students relating to sexual harassment or assault inside or outside of college are logged on CPOMS and followed up with actions also logged on CPOMS.
- Where incidents relate to inappropriate comments made by students (including sexual comments, remarks, jokes and online sexual harassment), this will be addressed in line with the College Disciplinary Policy and may include conversations with the student and their parents/carers with the goal of making it clear that such comments are unacceptable and inappropriate and to action disciplinary measures as appropriate. This may also involve ongoing education related to acceptable language.
- Where incidents relate to criminal behaviour onsite, the DSL will report this to the Police and will contact C-SPA to inform them that this report has been made.



- Where incidents relate to criminal behaviour that has occurred offsite or online, the DSL will advise the student (and parents where appropriate) to make a report to the Police. If appropriate, the DSL may also make a direct report to the Police and will seek advice from other professionals via the C-SPA consultation line (0300 470 9100), NSPCC helpline for professionals, or the link community Police Officer on the appropriate next steps.
- Where the college decide that the children involved do not require referral to statutory services, but may benefit from early help a referral to relevant external agencies may be made or additional college-based early help strategies may be implemented.

## ANTI-BULLYING:

- Our College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under Child Protection/ Safeguarding procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. All staff are aware that children with Special Educational Needs and Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. We keep a record of known bullying incidents on CPOMS and the DSL provides the College Executive with an annual report.

## ONLINE SAFETY

Woking College recognises that it is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

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

**Commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- The College's Online Safety Policy details the responsibilities of staff and students in respect to Online Safety.
- In addition, all students read and sign an Online Safety Code of Conduct each year alongside the student code of conduct. This details both risks and expectations in relation to online safety.
- Staff also read and sign an IT acceptable use agreement detailing their responsibilities and expectations regarding online safety.
- The tutorial programme and wider curriculum provide a range of opportunities to educate students about online safety concerns and parents and carers are informed about key online safety issues and support options.
- The College use Smoothwall as a filtering and monitoring resource and AB tutor for monitoring student screens in the LRC.

## ONSITE SAFETY

In order to ensure that anyone accessing the College campus is provided with a safe environment, it is a requirement that all staff and students wear lanyards with their college ID card. Visitors and contractors will be issued with a badge at reception to identify them as an official visitor to the College.

- All Staff will challenge any person on site not wearing a lanyard with ID card or a visitors' badge.
- All teaching staff are required to check students' lanyards are worn at the start and at the end of all teaching sessions. All staff should challenge lack of lanyards around campus.
- Lost lanyards and ID cards must be replaced immediately at the student's expense.
- Any student who has forgotten their ID badge / lanyard must collect a temporary wristband from Registry.

## CONTEXTUAL SAFEGUARDING AND LOCAL RISKS

Woking College believes all students have the right to access and enjoy a high quality and rich learning experience that both enhances and increases their life chances.

- The College serves the needs of students from a range of backgrounds and a wide demographic area. The town of Woking faces ongoing challenges with 'County Lines' issues and the College seeks advice from local partners in addressing these challenges.
- The College will regularly consult with local agencies including the South-East H.E. Prevent Co-Ordinator to ensure that all staff have an effective understanding of the local context and all safeguarding training will acknowledge and reference the extra-familial risks in our local context as well as online, to ensure that staff are adequately prepared to manage such issues that arise from this.

## LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN AND CARE LEAVERS

- The Designated Teacher and member of Senior Leadership Team with allocated responsibility for Looked after Children will act as key contacts and advisers for a Looked After Child or a previously Looked After Child during their time at the College. The Designated Teacher will meet on a termly basis with the student, their social worker and carers to update a Personal Education Plan.
- The College will work in close collaboration with Surrey Children's Services and the Surrey Virtual School to ensure all Looked After Children and previously LAC are identified and offered appropriate support mechanisms. This is outlined in more detail in the College's Looked After Children Strategy.

## CHILDREN MISSING FROM EDUCATION

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

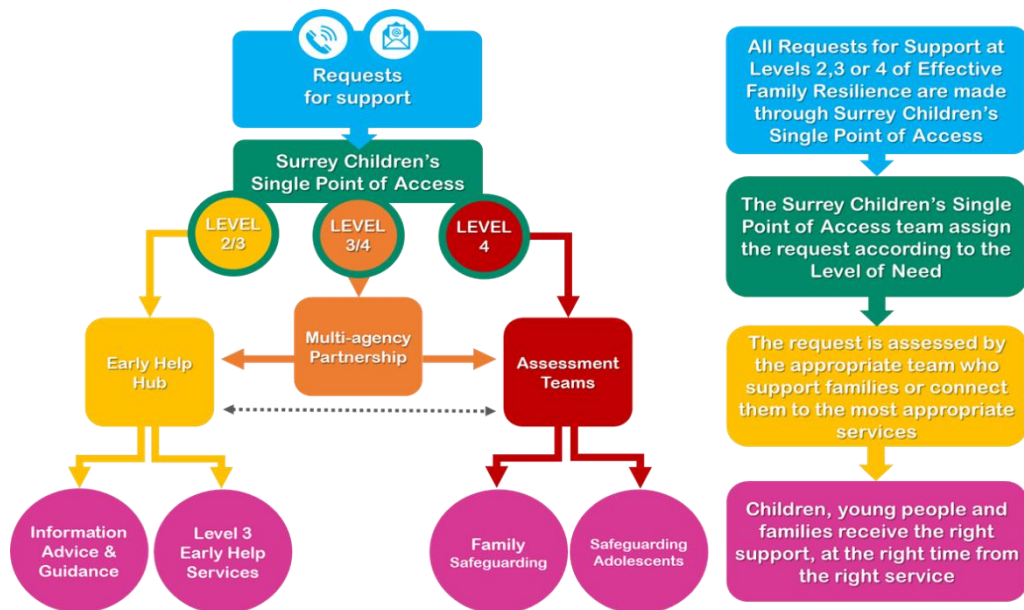
- The College recognises its important role in responding to persistently absent pupils and children missing education to support identifying such abuse, and in the case of absent pupils, to help prevent the risk of them becoming a child missing education in the future.
- In line with KCSIE 2025, the DSL/DDSL will alert any professionals working with a child if they show a worrying pattern of absences and will make a RFS referral via C-SPA if there are significant concerns linked to a child's absence from college. This could include repeated unexplained absences or situations where the College is unable to gain contact with a child or with their nominated parents/carers.
- The College will follow statutory guidance in terms of reporting to the LA those children who have been withdrawn from the College roll.

## REFERRAL PROCESSES FOR SAFEGUARDING CONCERNS

- **Children's Single Point of Access (C-SPA)**, a front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families. C-SPA is available **9am-5pm, Monday – Friday**

**Phone: 0300 470 9100**

**Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)**



- **Emergency Duty Team (EDT)**, provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**

**Phone: 01483 517898**

**Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)**

- The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, please contact the LADO on 0300 123 1650  
Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)
- NSPCC Helpline 0808 800 5000

Concerns relating to the handling of referrals by Surrey Safeguarding Children Board should be managed through the Surrey Escalation Policy (see Appendix 9)

## PREVENTION:

We recognise that the College plays a significant part in the prevention of harm to our young people by providing them with good lines of communication through trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- Work to establish and maintain an ethos where young people feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with young people e.g. through safety questionnaires, qualitative feedback participation, focus groups and in tutorials etc.
- Ensure that all young people know there is an adult in the College whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including Pastoral and Citizenship Education, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include topics such as anti-bullying and cyber bullying, e-safety, health education and preventing radicalisation.
- Ensure all staff are aware of college guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Ensure that Statements about or allegations of abuse or neglect made by young people must be taken seriously.

Woking College is further committed to applying these safeguarding principles to vulnerable adults.

## ALLEGATIONS MADE AGAINST STAFF AND VOLUNTEERS:

- All College staff should take care not to place themselves in a vulnerable position with a young person. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. For additional advice please see **Appendix 7**.
- All Staff should be aware of Surrey's Guidance on behaviour issues, and the College's own Staff Code of Conduct.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.
- We understand that a student may make an allegation against a member of staff.
- 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 aware of the information will immediately inform the Principal.
- The Principal will identify whether the allegation or concern meets the threshold for referral to the Local Authority Designated Officer (LADO). Allegations meet this threshold where there is an allegation that the individual has;
  - 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 they 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.
- If the allegation or concern meets the above criteria, the Principal on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) the Duty LADO can be

contacted on 0300 123 1650. Further information can be found here: [3.2 Managing allegations against people that work or volunteer with children | Surrey Safeguarding Children Partnership \(procedures.org.uk\)](https://www.surreysafeguarding.org.uk/procedures.org.uk).

- If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Trustees who will consult with the LADO, without notifying the Principal first.
- The College will follow the Surrey procedures for managing allegations against staff.
- Under no circumstances will we send a student home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.
- Suspension of the member of staff, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO and Personnel Consultant in making this decision.
- Where an allegation is made against a supply teacher, the Principal will immediately contact both the agency concerned and the LADO. The college will continue to support any investigation that is required.
- In the event of an allegation against the Principal, the decision to suspend will be made by the Chair of Trustees and the Chair will seek the advice of the LADO and Personnel Consultant in making this decision.
- 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.
- A flow chart illustrating the referral process is available in **Appendix 4**.
- Safeguarding concerns or allegations against staff that do not meet the LADO harm threshold, will be treated as Low-Level Concerns (*see Appendix 8*).

## CONFIDENTIALITY AND WHISTLE BLOWING:

- Woking College operates a confidentiality policy. However, under no circumstances will information be kept confidential that raises concern about the safety and welfare of a child or young person.
- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the college's safeguarding arrangements. If it becomes necessary to consult outside the college, they should speak in the first instance, to the LADO in accordance with the Whistleblowing Policy.
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their college. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Whistle-blowing regarding the Principal should be made to the Chair of Trustees whose contact details are readily available to staff.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and young people in accordance with the Information Sharing Policy published by HM Government, adopted by the Children's Trust and endorsed by SSCP. The Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm.
- All staff must be aware that they cannot promise a child that they will keep secrets/ not disclose potentially harmful information.

## WORK EXPERIENCE:

Woking College will ensure that: -

- Appropriate health and safety checks are in place prior to establishing work experience placements.
- Employers are aware of their responsibilities in relation to safeguarding and the protection of children or vulnerable adults.
- Staff are aware of the action to be taken, and by whom, should a child or vulnerable adult protection issue be raised before, during or after the placement.
- Enhanced Criminal Records Bureau checks, as additional safeguards, will be made when there are certain risk factors present. The risk factors include: -
  - A young person or vulnerable adult is likely to be or will be alone with an adult as part of the work placement. (NB. This does not apply to short periods alone, for example, a solicitor taking a student to and from court in a properly insured car).
  - A residential component.
  - The student is vulnerable. The College will identify to the placement organiser any student who may be vulnerable, for example, because of special needs, immaturity, abuse or neglect, substance misuse, etc, and who may therefore require additional safeguards.

## HEALTH ASSURED STUDENT SUPPORT PROGRAMME

As part of our wrap around Wellbeing support, Woking College have set up a provision with Health Assured who provide a 27/7 support line and Wellbeing App service.

This is a separate service offered to students of **Woking College**. Health Assured provides a confidential service and the information students discuss with their helpline support workers is not routinely provided to the College unless the health, wellbeing or welfare of the student is judged to be at imminent risk. In these circumstances and where the support worker thinks the student needs additional support they will seek consent to share the student's name and information about their concerns with the **Safeguarding Team** so that they can provide further help.

In some circumstances where the student is not able to provide consent or where they refuse consent, Health Assured may still decide to share relevant information with the College where it is necessary to protect the student or another person's vital interests. This approach is consistent with the College's **Safeguarding and Child Protection Policy**.

## STAFF INDUCTION TRAINING ON WOKING COLLEGE SAFEGUARDING PROCEDURES:

The initial training will ensure that all staff: -

- Know who to contact if they have a concern that a young person or vulnerable adult is at risk of serious harm.
- Know where to go for advice in relation to safeguarding or child/ vulnerable adult protection issues or when they are uncertain about whether to refer a concern about a child or vulnerable adult.
- Know the College procedure for referrals on child and vulnerable adult protection issues, including referrals to external agencies and partner organisations.
- Understand that they have the right to contact the appropriate agencies if they feel that concerns are not being passed on appropriately by designated College staff.
- Are aware of the requirement to create an accurate, detailed written log of all concerns and referrals on CPOMS.
- Understand the College Prevent Strategy and understand the signs of extremism and referral process to the Safeguarding Team.
- Understand Online Safety and how to minimise the risks of harm to young people.
- Understand 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. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the DSL or DDSL alerted to the concern.



- Understand that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
- Are able to recognise and respond to safeguarding and welfare concerns.
- Understand their responsibilities in being alert to the signs of abuse (see **Appendix 3 – definitions of Harm and indicators of abuse**)
- Know how to respond to a student who discloses abuse or is at risk of self-harm.
- Know the College's Policy and Procedures on Confidentiality and Disclosure in Child and Vulnerable Adult Protection cases.
- Understand that there is a need to take special care when working with young people with special needs or vulnerable adults and to be alert to signs of abuse as these members of the College may not be able to raise concerns themselves.
- Are aware of appropriate approaches to confidentiality and disclosure of information.
- Guidance on relationships with students

Working College will:

- Provide staff with a Code of Conduct along with guidance on appropriate relationships with students (**see Appendix 7**)
- Provide staff with regular additional training and guidance on specific safeguarding concerns.

## THE PREVENT AGENDA:

- Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have *"due regard to the need to prevent people from being drawn into terrorism"*. The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.
- **Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.**
- College staff should be aware, through training, of signs of radicalisation and have the confidence to report their concerns to the Designated Safeguarding Lead (Helena Clarke, Assistant Principal Support for Learning and Wellbeing) or in her absence, any member of the Senior Management Team.
- The Designated Safeguarding Lead will liaise with Surrey Police and with the FE/HE Regional Prevent Coordinator for the South East, following the procedures in the joint protocol, which may include referral to other external agencies.
- The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature. External speakers are risk- evaluated by the College Operations Group on a regular basis.
- The College uses filtering as a means of restricting access to harmful internet content. The College uses Smoothwall online filtering to ensure that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT network team and the LRC Manager continuously monitor activity on the network utilising the surveillance software 'AB Tutor Control'. This is also available to Teachers in the classroom. As some students and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.
- The College, in liaison with other local sixth form providers and the Surrey Police has developed a comprehensive *Prevent Strategy and Action Plan*. This strategy details the Colleges role in preventing the radicalisation of its students.

## RESTRAINT:

- Our 'Searching, confiscation and restraint procedures' set out in a separate document, outlines the College's procedures for managing situations where physical intervention may be required as a last resort when a child is at immediate risk of harming him /herself or others.

### **SUSTAINABLE ACCESS TO LEARNING:**

- Woking College is an educational institution for full time students. It has included in its mission statement the commitment to tailoring its education to individual needs and promoting inclusivity and tolerance. This philosophy underpins how we strive to make 'reasonable adjustment' and provide 'best endeavour' for any student. In doing so we fully comply with the Equality Act 2010 and the Children and Families Act 2014.
- It is important, however, to be clear about what is reasonable in an educational setting and the limits to the individual support that can be provided within a sixth form college. Our staff provide outstanding care for all students, but there will be times when a student's physical or mental health are so affected that they are no longer able, despite support both internal to the College and externally, to maintain a reasonable academic progress. The procedures for managing a student's ability to access their learning are contained within the Sustainable Access to Learning Procedures.

### **SAFER RECRUITMENT POLICY STATEMENT:**

Woking College has robust recruitment and vetting procedures to help prevent unsuitable people from working with children, which are in line with statutory guidance in [Keeping children safe in education 2025](#) using the framework for safer recruitment and employment practice.

- Our job advertisements and application packs make explicit reference to the College's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.
- All staff members, including volunteers, who have contact with children, young people and families will have appropriate pre-employment checks in line with Keeping Children Safe in Education 2025.

#### **Disclosure and Barring Service (DBS) Checks**

- All new staff and volunteers are to have a DBS check before commencing employment. Any failure to disclose convictions may result in disciplinary action or dismissal. Any positive disclosures will be discussed with the Safeguarding Lead, Principal and/or trustees. All this information will be kept on the personnel file. The DBS number and date of processing will be held on a secure database. A risk assessment will be completed if there is a positive DBS check sent back.
- At least one member on every short listing and interview panel will have completed safer recruitment training. Multi-agency training on safer recruitment is available via the NSPCC [Safer recruitment training: online & in-person | NSPCC Learning](#)
- The Principal, DSL, and the Safeguarding Trustee are responsible for ensuring that our single central record of pre-employment checks is accurate and up to date.



## ADDITIONAL RELEVANT POLICIES/ PROCEDURES

This safeguarding policy should be read alongside the following organisational policies, procedures and guidance:

- Prevent Strategy
- Woking College Safeguarding Guide
- Staff Code of Conduct
- Staff IT Acceptable Use Agreement
- Confidential Reporting (Whistleblowing) Policy
- Looked After Children Strategy
- Student Code of Conduct
- Online Safety Policy
- Health and Safety Policy
- Learning Support and SEND Policy
- Sustainable Access to Learning Procedure

## References

- [Keeping children safe in education 2025](#)
- [Surrey Safeguarding Children Partnership Procedures Manual. | Surrey Safeguarding Children Partnership](#)
- [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)
- [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](#)

Were changes made to the Policy when received? If YES complete the Partial Equality Analysis table.

Yes	No
x	

Questions for all Policies Is it likely that the Policy Revision could have a negative impact:-		Please Tick Box	
		YES	NO
1.	On minority ethnic groups?		X
2.	Due to gender?		X
3.	Due to disability?		X
4.	Due to sexual orientation?		X
5.	Due to their religious beliefs (or none)?		X
6.	On people due to them being transgender or transsexual?		X
Additional questions for Policies relating to Staff Is it likely that the Policy Revision could have a negative impact:-			
7.	On people due to their age?		X
8.	On people due to their marital or civil partnership status?		X
9.	On people with dependants/caring responsibilities?		X

Date of Review

September 2025

If YES please speak with The Assistant Principal as a full Equality Analysis may be required.

HCL Safeguarding Policy: Sep 2025  
Last reviewed: Sep 2025  
Next review: September 2026

## Appendix 1 - Key Contacts

### Contact Details for Safeguarding at Woking College

Email for non-urgent safeguarding communications: [dsl@woking.ac.uk](mailto:dsl@woking.ac.uk) Please see APPENDIX 4 for information about safeguarding referral process.

Safeguarding Role	Name	Position	Contact Details
DSL Strategic (Member of SLT with responsibility for safeguarding)	Helena Clarke	Assistant Principal (Support for Learning and Wellbeing)	<a href="mailto:hcl@woking.ac.uk">hcl@woking.ac.uk</a> 01483 761036
DSL Operational	Sophie Mngoma	Pastoral Director	<a href="mailto:smn@woking.ac.uk">smn@woking.ac.uk</a> 01483 761036
DDSL	Laura Olrod	Head of Year – Foundation Level 2	<a href="mailto:lol@woking.ac.uk">lol@woking.ac.uk</a> 01483 761036
DDSL	Laura Thomas	Head of Year – Year 12	<a href="mailto:lth@woking.ac.uk">lth@woking.ac.uk</a> 01483 761036
DDSL	Samad Naheem	Head of Year – Year 12	<a href="mailto:сна@woking.ac.uk">сна@woking.ac.uk</a> 01483 761036
DDSL	Jade Douthwaite	Head of Year – Year 12	<a href="mailto:ido@woking.ac.uk">ido@woking.ac.uk</a> 01483 761036
DDSL	Anne Jackman	Head of Year – Year 13	<a href="mailto:aja@woking.ac.uk">aja@woking.ac.uk</a> 01483 761036
DDSL	Victoria Wood	Head of Year – Year 13	<a href="mailto:vwo@woking.ac.uk">vwo@woking.ac.uk</a> 01483 761036
DDSL	Emily Driscoll	Head of Year – Year 13	<a href="mailto:edr@woking.ac.uk">edr@woking.ac.uk</a> 01483 761036
DSL	Lorraine Somersall- Weekes	Student Wellbeing Co- ordinator	<a href="mailto:lso@woking.ac.uk">lso@woking.ac.uk</a> 01483 761036
Safeguarding Link Trustee	Anne Middleton	Safeguarding Trustee	Contact via Clerk to the Trustees: <a href="mailto:sch@woking.ac.uk">sch@woking.ac.uk</a>
Chair of Trustees	Tim Stokes	Chair of Trustees	Contact via Clerk to the Trustees: <a href="mailto:sch@woking.ac.uk">sch@woking.ac.uk</a>

## Appendix 1 – Contact Details for Key Safeguarding Agencies

### ***Surrey Safeguarding Children Partnership***

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

Tel: 01372 833330

***Children's Single point of access (C-SPA) - for advice and referrals where there are safeguarding concerns about a child.***

Phone: 0300 470 9100 (including child protection consultation line)

Out of hours phone: 01483 517898 to speak to our emergency duty team.

Email: emails are dealt with during normal office hours. For concerns for a child or young person:

[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

### ***Local Authority Designated Officers (LADO)***

Duty LADO please call 0300 123 1650 (option 3) or email [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

To report an allegation against a professional please contact the Local Authority Designated Officer (LADO)

Please send completed forms to:

[LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

The partnership procedures for managing allegations against professionals who work with children can be found at <https://surreyscb.procedures.org.uk/>

***Surrey Safeguarding Partnership Team - For queries about documents and Surrey processes.***

Team email: [partnership.team@surreycc.gov.uk](mailto:partnership.team@surreycc.gov.uk)

## Appendix 2 - Managing a Disclosure

- Listen carefully rather than asking leading questions.
- Never *promise* any particular action or NOT to disclose any information shared.
- Allow silence and/or allow child, young person to be upset.
- Try to relate to the age, understanding or special needs of the child or young person.
- Write down carefully the information you have been given as soon as possible, preferably within 24 hours and only including what you have been told.
- Discuss this as soon as possible with the safeguarding lead/ manager.
- Any decision not to tell the parents must be discussed with the safeguarding lead/ line manager unless the child or young person is in immediate danger.

### Parents/ carers

It is good practise to be as open and honest as possible with parents/carers about any concerns. However, you must not discuss your concerns with parents/ carers in the following circumstances:

- Where sexual abuse or exploitation is suspected.
- Where organised or multiple abuse is suspected.
- Where fabricated or induced illness is suspected.
- Where female genital mutilation is a concern.
- In cases of forced marriage.
- Where contacting parents / carers would place a child / young person or others at immediate risk.

### General safeguarding advice for all staff and volunteers:

- Remember not to be a young person's friend; always maintain a professional manner when working with them.
- Do not accept a young person as a friend on any social networking site that you use.
- Always keep a record of any Teams or email exchanges with a young person (staff will use work telephones where available).
- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.
- Do not meet a young person alone; this is for the safety and well-being of the young person but also yourself.
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.
- Never speak to the press about a child or young person without permission from the Principal.

## Appendix 3 – Definitions of Harm and Indicators of Abuse

### Definitions of harm (*see Woking College Safeguarding Guide for more detailed information*)

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they should always speak to the designated safeguarding lead (or a deputy).

### Forms of abuse and Neglect:

- Neglect - the persistent failure to meet the basic physical and physiological needs of the young person that results in serious impairment of their health and development, including the failure to provide adequate food, clothing, shelter and failure to respond to basic emotional needs, such as being cared for when sick.
- Abandonment - leaving a child alone and unattended in circumstances that are inappropriate for their age and/ or level of ability.
- Emotional abuse – persistent, emotional ill treatment that has a severe adverse effect on the emotional development of children and young people. It may involve conveying to them that they are not wanted, not loved or worthless. It may involve inappropriate expectations (such as taking on the responsibility of an adult within the family) being placed on the young person leaving them frightened and unable to cope. It may also involve the threatening, exploitation or corruption of children and young people.
- Physical abuse – hitting, kicking, shaking, slapping, and throwing, scalding, burning, poisoning, drowning, suffocating, or other action intended to cause physical harm or ill health to the child or young person. Physical harm may also be caused when a parent or carer covers up the symptoms of, or deliberately causes ill health to a child or young person within their care.
- Racial abuse – any type of verbal or physical abuse that is directed at an individual or group because of their racial or ethnic background.
- Witnessing ill treatment, including domestic abuse of another person- this may impact the health or development of a child or young person.
- Sexual abuse or sexual exploitation - forcing or enticing a child or young person to participate in sexual activities, whether or not the child or young person is aware or has knowledge of what is happening. It includes child prostitution, encouraging children or young people to watch or participate in the production of pornographic material, online grooming, encouraging children and young people to behave in sexual inappropriate ways. Sexual acts include penetrative (rape or buggery) and non-penetrative acts such as touching or stroking.

The Sexual Offences Act 2003 defines 'consent' as '*if he agrees by choice and has the capacity to make that choice*'. The Act, removes the element of consent for many sexual offences for:

- Children/young people under 16 (including under 13).
- Children/ young people under 18 having sexual relations with a person of trust (for example: teachers, youth workers, foster carers, police officers).
- Children / young people under 18 involved with family members over 18.
- Persons with a mental disorder impeding choice or who are induced, threatened or deceived.
- Persons with a mental disorder who have sexual relations with care workers.

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

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

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

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

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

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

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

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

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

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

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

## County lines

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

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

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

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#).

### **Children and the court system**

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

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Cybercrime**

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

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

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

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

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

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

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

## Domestic abuse

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

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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



## Operation Encompass

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass website](#).

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

## National Domestic Abuse Helpline

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

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

## Mental health

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

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England.<sup>1</sup> has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

## Modern Slavery and the National Referral Mechanism

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

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

## Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

**Radicalisation**<sup>2</sup> is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism**<sup>3</sup> is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are [factors that may indicate concern](#).

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<sup>1</sup> Public Health England: has now been replaced by the UK Health Security Agency and the Office for Health Improvement and Disparities (OHID), which is part of the Department of Health and Social Care, and by the UK Health Security Agency. However, the branding remains unchanged.

<sup>2</sup> As defined in the [Government's Prevent Duty Guidance](#) for England and Wales.

<sup>3</sup> As defined in the Terrorism Act 2000 (TACT 2000) <http://www.legislation.gov.uk/ukpga/2000/11/contents>

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

### The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard<sup>4</sup> to the need to prevent people from becoming terrorists or supporting terrorism".<sup>5</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

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

### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#).

The [Safeguarding and Prevent - The Education and Training Foundation \(etfoundation.co.uk\)](#) provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

London Grid for Learning has also produced useful resources on Prevent ([Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#)).

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<sup>4</sup> [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](#)

<sup>5</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

## Serious Violence

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

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

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

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

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

[Police, Crime, Sentencing and Courts Act 2022](#) introduced a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

## So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of

preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>6</sup> that requires a different approach (see below).

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

### Female Genital Mutilation (FGM)

- Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.
- The duty applies to all persons in college who are employed or engaged to carry out 'teaching work' in the college, whether or not they have qualified teacher status.
- The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.
- If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.
- College staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the college's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.
- There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.
- There are no circumstances in which a teacher or other member of staff should examine a child.
- [FGM Fact Sheet.pdf](#)

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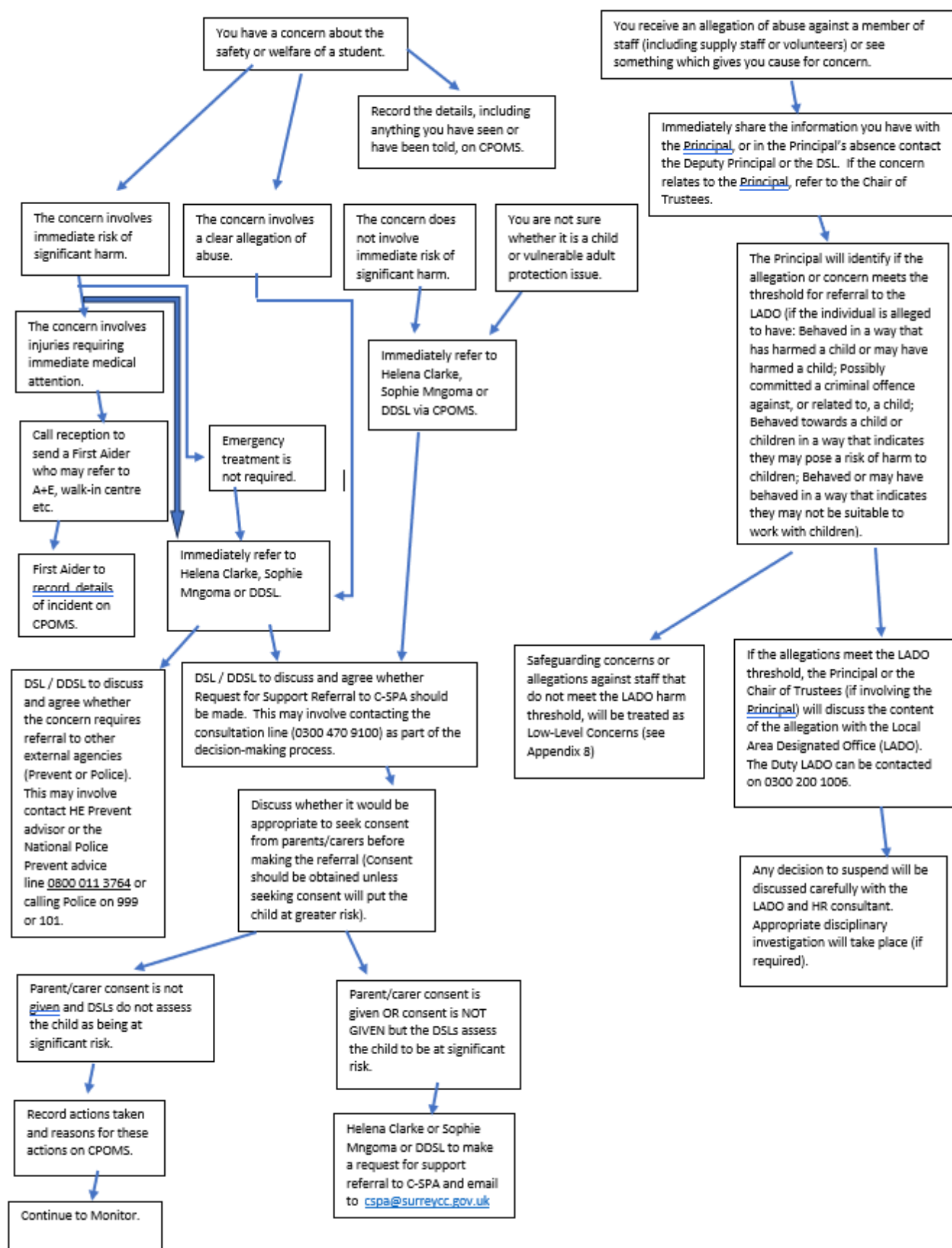
<sup>6</sup> Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

## Forced Marriage

- A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.
- Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- A forced marriage is not the same as an arranged marriage which is common in many cultures. 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 the prospective spouses.
- College staff should never attempt to intervene directly as a college or through a third party. Contact should be made with C-SPA and/or the Forced Marriage Unit: 020 7008 0151. Email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)  
[Forced marriage guidance 17.03.22 .pdf](#)

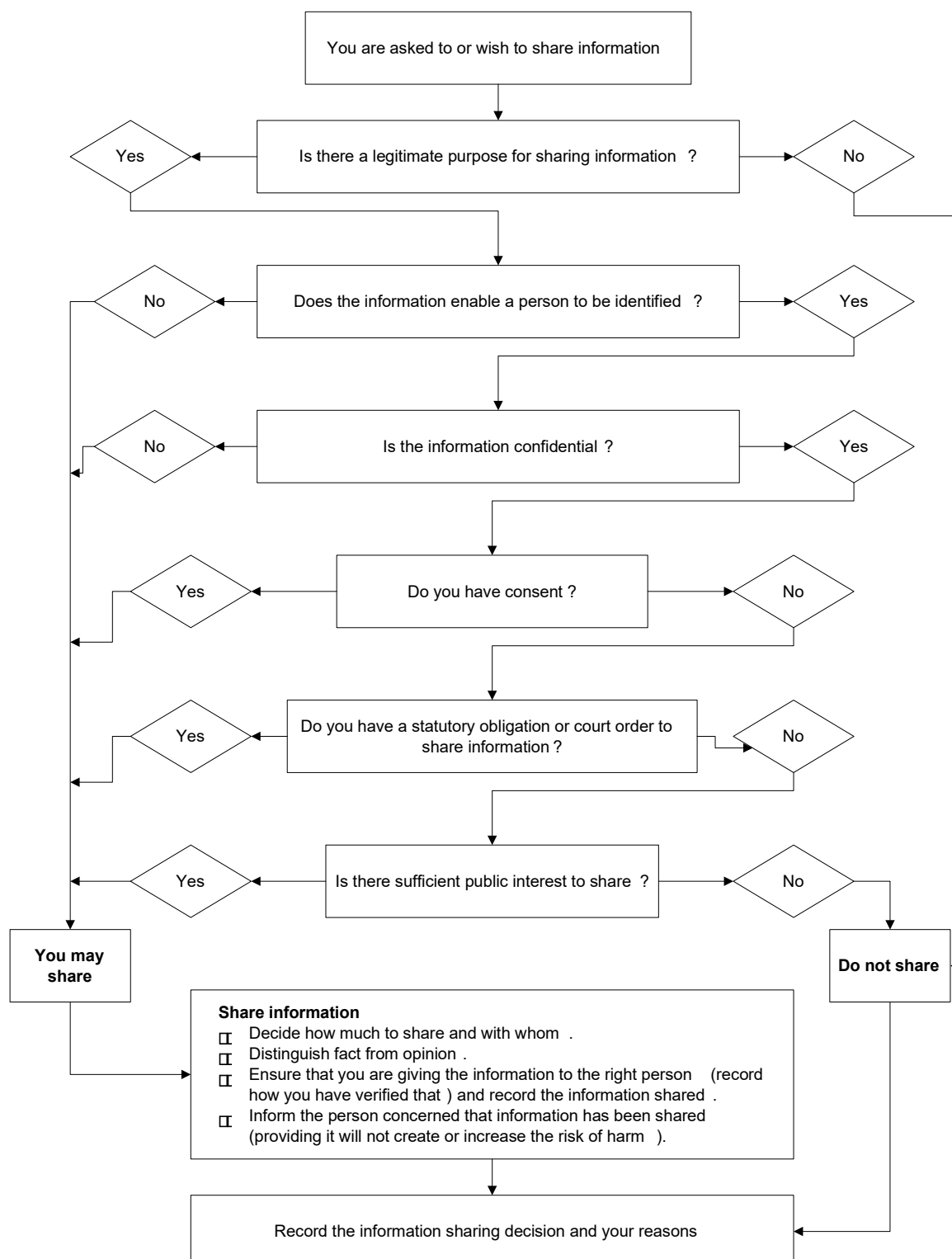
## Appendix 4 - Child Protection and Vulnerable Adults Referral Flow Chart

Child Protection and Protection of Vulnerable Adults Referral Flow Chart



## Appendix 5 - Child Protection and Vulnerable Adults information sharing.

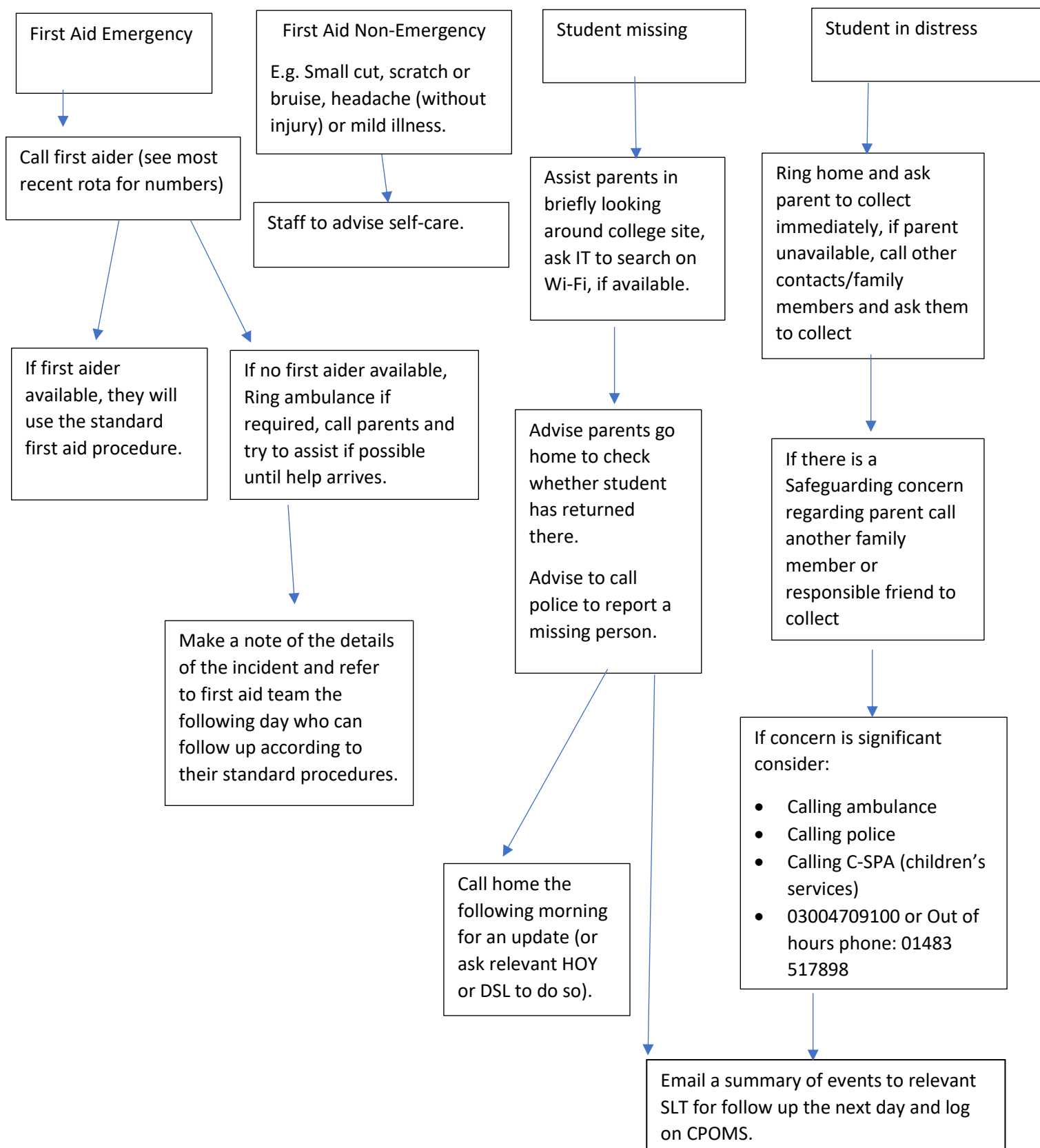
### Child Protection and the Protection of Vulnerable Adults: Principles for information sharing





## Appendix 6

### After Hours Incidents



## Appendix 7: Guidance on relationships with Students

The vast majority of staff who work with young people and vulnerable adults in educational settings act professionally and seek to provide a safe and supportive environment for students. It is recognised that achieving this aim is not always straightforward. Much relies on student and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This guidance should not be interpreted to mean that, in order to avoid misplaced allegations, all forms of physical or close contact with students should be avoided. There will be occasions where physical contact is appropriate, e.g. in situations where a degree of physical intervention is required. The guidance is concerned with avoiding sexual activity in a relationship of trust and other contact which may be inappropriate.

### Relationships of Trust

A relationship of trust exists where a teacher, member of staff or volunteer is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken. Those in a position of trust must carry the responsibility of ensuring that they do not abuse their position or put themselves in a position where allegations of abuse of trust, whether justified or unfounded, could be made.

It is important to recognise that a variety of circumstances can arise, including a sexual relationship at one end of the scale, through close friendships, to, at the other end of the scale, an innocent situation which has been entirely misconstrued. Staff and volunteers should take steps to minimise the risk of circumstances being misconstrued or misunderstood and relationships with language and conduct which could give rise to comment and speculation.

All staff should clearly understand the need to maintain appropriate boundaries in their dealings with students. Intimate or sexual relationships between staff and students will be regarded as a grave breach of trust. Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong. A sexual relationship will be intrinsically unequal within a relationship of trust and is therefore unacceptable. Abuse of trust involving sexual activity with a young person under 18 or a vulnerable adult who is a student at the College may be a criminal offence under the Sexual Offences Act 2003. It is also inappropriate since the professional relationship of trust would be altered.

From time to time staff may encounter students who display attention-seeking behaviour, profess to be attracted to them or begin to develop a relationship of emotional dependency. Particular care should be exercised if the student is vulnerable. Staff should aim to deal with those situations sensitively and appropriately, but ensure that their behaviour cannot be misinterpreted. The member of staff or volunteer should inform their line manager if they have any concerns or if there is a concern that a young person is becoming attracted to him or her, or that there is a developing attachment or dependency. If a member of staff or volunteer is concerned that s/he might be developing a relationship with a young person, which could have the potential to represent an abuse of trust, the first advice must be to ensure that the relationship does not develop further. Arrangements should be made by the line manager to minimise direct contact between the student and member of staff or volunteer and to prevent all contact if possible. Where contact must take place another member of staff should be present at all times.

Staff should be aware that private meetings with individual students might give rise to concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another

student should be present or nearby. Where such conditions cannot apply, staff should ensure that another adult knows that the interview is taking place.

Students should not be asked or encouraged to visit the home of a member of staff or socialise informally outside College. These contacts or visits can place staff in a vulnerable position and can in some case lead to allegations being made against staff. Private or additional tuition for students should be conducted on College premises or, if at the young person's home, in the presence of a parent. Meetings away from the College premises or arrangements for private tuition in a student's home should only be arranged with the specified approval of the Principal. Staff should adhere to the guidance regarding outside commitments in the Code of Conduct for Employees.

The following are examples of actions, albeit not overtly abusive, that could be interpreted as a member of staff 'grooming' a student or allowing a dependent relationship to begin or continue: -

- Inviting students to their home.
- Visit students at their home.
- Giving students gifts.
- Offering students lifts outside normal duties.
- Singling individual students out for special attention.
- Seeing students socially.

Staff should not give students their personal mobile or home telephone number, personal e-mail address or access to their own personal social media accounts (not adding students as friends on Facebook, for example).

The frequency, nature and degree of such behaviour may justify the need for further investigation.

## **Physical Contact**

Physical contact may be misconstrued by a student, parent or observer. Touching students, including well-intentioned gestures such as putting a hand on a shoulder, can, if repeated regularly, lead to serious questions being raised, particularly if this occurs when a member of staff is alone with a student. As a general principle, staff must not make gratuitous physical contact with their students. It is particularly unwise to attribute touching to their teaching style or as a way of relating to students. Teachers and other staff do however have the right to use reasonable physical intervention to restrain students in certain circumstances. Staff should be aware of the College's policy on the use of physical intervention.

There may also be occasions where a distressed student needs comfort and reassurance which may include physical comforting such as a caring parent would give. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact, particularly with the same student over a period of time. Where a member of staff has particular concern about the need to provide this type of care and reassurance they should seek the advice of the Director of Support for Learning.

Some staff are also likely to come into physical contact with students from time to time in the course of their duties. Examples of this could include sports coaching which may involve non-sexual physical contact. Contact of this type should not take place when a member of staff is alone with a student.

**Staff should comply with the expected standards of professionalism as detailed in the Staff Code of Conduct.**

## Appendix 8: Low Level Concerns

Staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

### Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with Woking College's Staff Behaviour and Code of Conduct,
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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. It is crucial that any such concerns, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

### Reporting low-level concerns

Where a low-level concern has been identified, this should be reported as soon as possible to the Principal. However, it is never too late to share a low-level concern if this has not already happened. Where the Principal is not available, the information should be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SLT acting in this role.

Low-level concerns about the Designated Safeguarding Lead should be reported to the Principal and those about the Principal should be reported to the Chair of Trustees. Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Principal of the details as soon as possible.

### Recording concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of concerns must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Recorded concerns should be retained at least until the individual leaves employment.

## **Responding to low-level concerns**

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice from the Finance Director may also need to be taken) Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.

The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Finance Director.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Finance Director. In this case the College's Staff Behaviour and Code of Contact with the Child Protection and Safeguarding Policy and Disciplinary Policy will be followed.

When considered with any other low-level concerns that have previously been made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

### **Anonymity:**

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

### **Individuals reporting concerns about themselves:**

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

### **References:**

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

### **Role of Trustees:**

The Principal will regularly inform the Trustees about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data.

The Safeguarding Trustee may also review an anonymised sample to ensure that these concerns have been handled appropriately.

## Appendix 9: Surrey Safeguarding Partners Escalation Process

Safeguarding Partners in Surrey have recognised that the needs of Children and their families can often be complex and may require a range of interventions and support that need to be tailored to meet their differing needs and circumstances.

1.2 Often there may be no right or wrong solution and quite legitimately practitioners may exercise their professional judgement differently and have differing opinions of what the right approach should be. It is also the case that exceptionally, the needs of some young people and families may not easily fit within our conventional application of thresholds.

1.3 It is of vital importance that, children, young people and their families do not become entangled in professional disagreements and that where such disputes do occur, they can be resolved together, with minimum delay.

1.4 In reaching a resolution it is essential that at all times, disputes are approached in a considerate manner and one which both respects and seeks to understand the views and concerns of others when engaging with the young person and their family.

1.5 The Surrey *FaST* (Finding Solutions Together) resolution process has been agreed with all our partners, as a mechanism for seeking solutions that places the needs of the child and the family at its centre.

1.6 The primary aim of the Surrey *FaST* resolution process is that professional disagreements are resolved at the lowest possible level, by those working directly with children and families.

1.7 The Surrey *FaST* resolution process recognises that children are best safeguarded when professionals who support them and their families, work well together through timely, respectful, solution-focused, and child centred communication and coordinated action.

1.8 The Surrey *FaST* resolution process applies to and should be used by ALL agencies who work with children and families in Surrey.

1.9 Safeguarding Partners in Surrey appreciate that it is not always easy to find the right person to talk to in another agency and that professional judgements need to be made when deciding whether or not a response is reasonable and when to move up to the next stage of the process. The SSCP Business Team are always available to provide support and guidance to agencies, to help with this decision making. They can be contacted at any stage by email at [partnership.escalation@surreycc.gov.uk](mailto:partnership.escalation@surreycc.gov.uk)

1.10 All key partners have been asked to identify a Single Point of Contact who can assist with this decision making and support colleagues in other agencies to identify the right person to speak with at each stage of the process.

The chart below shows an overview of the Finding Solutions Together or *FaST* resolution process. A detailed explanation of these stages is set out here <https://surreyscb.procedures.org.uk/skyqox/complaints-and-disagreements/inter-agency-escalation-policy-and-procedure> .

## FINDING SOLUTIONS TOGETHER



MAXIMUM  
2 WORKING  
DAYS

STAGE  
**5**

### SSCP LEVEL:

Escalation raised to SSCP level by contacting the Partnership Development Manager at Surrey CC if previous stage has not resolved concern.



MAXIMUM  
2 WORKING  
DAYS

STAGE  
**4**

### HEAD/DIRECTOR:

Escalation raised to Directors/Heads of Service level if previous stage has not resolved concern. Respective Directors/Heads of Service to discuss and seek a resolution.



MAXIMUM  
2 WORKING  
DAYS

STAGE  
**3**

### TEAM/SERVICE MANAGEMENT:

Escalation raised to line manager level if previous stage has not resolved concern. Respective line managers to discuss matter and seek a resolution.



MAXIMUM  
2 WORKING  
DAYS

STAGE  
**2**

### INTER-AGENCY DISCUSSION:

Discussion between the professionals from the different agencies to see if their disagreement can be resolved.



MAXIMUM  
2 WORKING  
DAYS

STAGE  
**1**

### INTERNAL DISCUSSION:

Any professional who disagrees with a decision should discuss the issue with their line manager to clarify their thinking.



## FINDING SOLUTIONS TOGETHER



### PURPOSE:

We recognise that the needs of Children and their families can be complex and the range of interventions and support may not always fit into a simple formula, that will provide "the right solution" in every situation.

We are fortunate to have a broad spectrum of professionals to call upon to find and provide the best solutions for our children, however there is no clear right or wrong answer and practitioners may exercise their professional judgements differently.

It is important that any professional disagreements are addressed and resolved as quickly as possible, so that our children and their families get the help they need, as quickly as possible. The Surrey FaST (Finding Solutions Together) resolution process is our way of enabling this.



### DO'S...

- Respond promptly
- Keep the child at the centre
- Be curious and consider the full case history
- Focus on finding solutions
- Call on other agencies for support



### DONT'S...

- Do NOT ignore an escalation
- Do NOT be defensive
- Do NOT make it about you or your agency - keep the focus on the child
- Do NOT let thresholds be a barrier to action

## HELP DESK

### WHO TO CONTACT:

Children's Services: [sharon.gibbons@surreycc.gov.uk](mailto:sharon.gibbons@surreycc.gov.uk)

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For contacts in other services visit:

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