Hereford
SIXTH FORM COLLEGE

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

2025/26

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Safeguarding and Child Protection Policy

Hereford Sixth Form College holds both a statutory and moral duty to safeguard and promote the welfare of all children and young people receiving education or training at the College. All learners have the right to feel safe and protected. Safeguarding is everyone's responsibility, and the best interests of the child or young person must be the top priority. All staff, volunteers, and visitors who engage with learners have a role to play.

The College works in partnership with the **Herefordshire Safeguarding Children Partnership**, consisting of:

- **Herefordshire Council** – Director of Children's Services
- **West Mercia Police** – Superintendent Policing Commander for Herefordshire
- **Herefordshire Clinical Commissioning Group** – Head of Safeguarding & Designated Nurse

This collaboration ensures safeguarding procedures remain robust and effective. The College adheres to the Herefordshire Safeguarding Children Partnership's **threshold guidance**, which outlines processes for early help assessment, levels of need, and referral criteria for the **Multi-agency Safeguarding Hub (MASH)** team. This guidance can be accessed herehttps://www.herefordshiresafeguardingboards.org.uk/professional-resources/childrens-policies-guidance/15-thresholds-guidance

The MASH team assesses referrals using shared information from multiple agencies and can trigger an immediate response if needed. Where a student lives outside Herefordshire, local safeguarding guidance will be followed for appropriate referral to children's social care teams.

The College also recognises its responsibility to protect **vulnerable adults**. Under the *Care Act 2014*, safeguarding duties apply to an adult (18+) who:

- Has needs for care and support;
- Is experiencing or at risk of abuse or neglect; and
- Is unable to protect themselves due to those care and support needs.

(Source: Care and Support Statutory Guidance, p. 229)

If an adult student meets this definition of an **Adult at Risk**, the College may seek advice or make a referral to the **Herefordshire Safeguarding Adults Board** or the appropriate board in their home authority. Access further information here: Herefordshire Safeguarding Adults Board: https://www.herefordshiresafeguardingboards.org.uk

Staff are expected to read this policy alongside the College's **Code of Conduct for Staff** and other relevant safeguarding policies, all available via the **Staff Portal**. Staff development includes induction and annual updates covering their roles, including IT filtering and monitoring responsibilities.

Policy Scope and Key Guidance

This policy refers to “children and young people,” meaning those under 18, but also includes vulnerable adults, including those at risk of abuse, exploitation, or teenage relationship abuse.

The College follows key statutory documents:

- **Working Together to Safeguard Children (2026):** https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
- **Keeping Children Safe in Education (2025):** https://assets.publishing.service.gov.uk/media/686b94eefe1a249e937cbd2d/Keeping_children_safe_in_education_2025.pdf

These documents define safeguarding as protecting children from maltreatment, preventing impairment of health or development, ensuring safe and effective care, and enabling all children to have the best outcomes.

Child protection specifically refers to activity undertaken to protect children suffering or likely to suffer significant harm (DfE, Working Together 2026).

The College’s Commitment

Hereford Sixth Form College is dedicated to safeguarding and promoting the welfare of all students. We believe:

- All children/young people have an equal right to be protected from harm.
- Support must be tailored to individual needs, including those who may have experienced abuse.
- Children/young people must be encouraged to speak freely and voice their beliefs.
- Their wishes and feelings must inform action and service provision.
- Respect, inclusion, and peer support must be promoted.
- Emotional and social needs must be addressed alongside educational goals.
- Colleges contribute to the prevention of abuse, exploitation, bullying, discrimination, and harmful behaviour.
- All staff and visitors play a key role in safeguarding.
- The College operates a **zero-tolerance approach** to sexual violence and harassment.

For adults at risk, safeguarding means:

- Preventing abuse and neglect;
- Reducing risk and harm;
- Supporting autonomy and choice;
- Focusing on improving life outcomes.
  (Source: *Care Act 2014*)

The Local Governing Board

The **Local Governing Board** ensures the College:

- Provides a safe learning environment;
- Identifies children or young people at risk;
- Acts to protect and support those identified.

The Board receives an **annual safeguarding report** from the **Designated Safeguarding Lead (DSL)** and reviews the policy annually to:

- Raise awareness about safeguarding and welfare.
- Aid early identification of those at risk.
- Establish procedures for handling concerns and allegations.
- Oversee **safe recruitment** processes.

This policy was developed in line with Department for Education guidance, national legislation, and in partnership with Herefordshire's safeguarding boards.

The College refers safeguarding concerns to **Children's or Adults Social Care**, the **police**, or other relevant agencies. Referrals for students outside Herefordshire are made to their respective local authorities.

The Governing Board has appointed Catriona Ward as the **Named Governor for Safeguarding**. Her contact details are held by the Designated Safeguarding Lead. The Named Governor's responsibilities include:

- Ensuring the College's procedures align with local safeguarding partnerships;
- Reviewing the College's safeguarding policies annually;
- Ensuring compliance is reported to the Governing Board;
- Overseeing **IT filters and monitoring systems**.

The Designated Governor has received appropriate training and collaborates with the **Chair of Governors** in liaising with relevant agencies in the event of any safeguarding allegation involving the Principal. They do not conduct investigations but ensure effective communication and coordination.

Designated Senior Members of Staff with Lead Responsibility for Safeguarding and Child Protection

Designated Safeguarding Lead (DSL): John Pratt jpp@hereford.ac.uk

A member of the Senior Management Team, John holds lead responsibility for promoting awareness among staff of safeguarding issues and ensuring a safe environment for all learners. He oversees safeguarding, child protection, and filtering and monitoring systems.

John has completed training in safeguarding and inter-agency working in accordance with **Herefordshire Safeguarding Children Partnership** guidance and undertakes **annual refresher training**, including **Prevent Awareness**. He stays up to date via bulletins, meetings with other DSLs, and reviewing new developments.

DSL's Responsibilities include:

- Overseeing referrals of suspected abuse or allegations to relevant local safeguarding children or adult teams based on the student's place of residence.
- Referring cases to the **Channel Programme** for radicalisation concerns in collaboration with the **Single Point of Contact for Prevent**.
- Referring criminal matters to the **Police** as required.
- Liaising with the **Senior Mental Health Lead** when safeguarding concerns relate to mental health.
- Considering and initiating **early help** assessments and support when appropriate.
- Keeping the **Principal** informed of major issues, including Section 47 Children Act 1989 enquiries and police investigations.
- Advising staff on safeguarding issues and supporting them in raising concerns.
- Maintaining secure records of all safeguarding concerns, whether or not they lead to referrals.
- Making the Safeguarding and Child Protection Policy available to parents via the **College website** or upon request.
- Liaising with the **Herefordshire Safeguarding Children Partnership**, the **Herefordshire Safeguarding Adults Board**, and other relevant agencies.
- Coordinating with secondary schools for **student transitions** and the transfer of safeguarding files.
- Ensuring that child protection files are transferred securely to new institutions, with confirmation of receipt.
- Liaising with employers and placement providers to ensure appropriate **safeguards** for students on external placements.
- Ensuring that all staff complete **universal safeguarding training**, understand internal procedures, and are aware of online safety protocols.
- Supporting the safeguarding team and **Pastoral Support** staff in identifying early help needs.
- Monitoring students with a **social worker** and ensuring necessary adjustments are in place.

- Promoting positive **educational outcomes** by sharing relevant safeguarding information with teaching and leadership staff.
- Making referrals, in collaboration with the Principal, to the **Disclosure and Barring Service** where staff are dismissed due to risk/harm to a child.

At the end of each academic year, the DSL provides a safeguarding report to the **Governing Body** and reports any policy or procedural deficiencies identified by the Herefordshire Partnership.

Deputy Designated Safeguarding Leads (DDSLs)

The following staff are Deputy Designated Safeguarding Leads:

- **Deputy Designated Safeguarding Leads:**

- **Matt Bunston** (Safeguarding and Pastoral Support Manager) **matt.bunston@hereford.ac.uk**
- **Phil Tranter** (Deputy Principal) **pjt@hereford.ac.uk**
- **Gemma Cosgrove-Ball** (Lead Tutor) **g.cosgrove-ball@hereford.ac.uk**
- **Jade Finney** (Lead Tutor) **j.finney@hereford.ac.uk**
- **Jo Peters** (Lead Tutor) **joanne.peters@hereford.ac.uk**
- **Jules Price-Hutchinson** (Lead Tutor) **j.price-hutchinson@hereford.ac.uk**
- **John Pratt** is also the **acting Designated Teacher for Children in the Looked After System**, **Single Point of Contact for Prevent**, a member of the **Herefordshire Channel Panel**, and represents the four post-16 colleges on the **Herefordshire Prevent Steering Committee**.

DDSLs responsibilities include:

- Working closely with and reporting to the DSL.
- Making safeguarding referrals to the **Local Safeguarding Children Partnership** or the **Safeguarding Adults Board** as needed.
- Referring concerns of radicalisation to the **Channel Programme** in collaboration with the DSL or Prevent SPOC.
- Maintaining secure records of all safeguarding concerns and referrals.
- Providing advice and guidance to staff.
- Being available to listen to students.
- Managing cases and attending **Child Protection Conferences**, **Core Groups**, or **Child in Need meetings**.
- Completing training to the same standard as the DSL, with **annual refresher updates**.
- Supporting **early help assessments** and planning.

A Whole-College Approach

Safeguarding and promoting welfare is everyone's responsibility. All staff, volunteers, and those in contact with students must be alert to concerns, share information appropriately, and take timely action. The College's **Pastoral and Safeguarding Team**, including **Personal and Lead Tutors**, works collaboratively with teaching and support staff to address personal welfare and lower-level safeguarding concerns—ensuring all students can succeed.

*See **Appendix 1** for the pastoral and safeguarding structure diagram.*
*See **Appendix 2** for a summary of designated staff roles*

Abuse and Neglect

"Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others, some of which can be **hidden (non-visible**). This includes exposure to domestic abuse, whether by seeing, hearing, or experiencing its effects. Abuse can occur in families, institutions, or communities, and may be perpetrated by adults or other children. It may occur entirely online or be facilitated by technology." (Source: *Keeping Children Safe in Education*).

The **Local Governing Board** recognises the importance of understanding the categories of abuse and safeguarding concerns. Full details are available in **Appendix 3** of this policy for reference by staff, governors, and volunteers.

While any child may benefit from Family help, staff should be especially alert to those who:

- Have a **disability, health condition**, or SEN (with or without an EHCP)
- Have **mental health needs** or are **young carers**
- Show signs of **criminal exploitation**, county lines, or gang involvement
- Are frequently **missing** from education, home, or care
- Are at risk of exclusion or have multiple suspensions
- Face risks such as trafficking, **radicalisation**, or sexual/criminal exploitation
- Have **family challenges** (e.g. substance misuse, domestic abuse, parental offending)
- Are affected by so-called 'honour'-based abuse, including **FGM** or **Forced Marriage**
- Are privately fostered
- Misuse alcohol or drugs
- Living within birth families or **extended family arrangements**
- Living in **kinship care**, whether formal or informal
- Subject to **Special Guardianship Orders**
- **Adopted**, including those with ongoing support or emerging needs
- **Children looked-after**, including those in foster homes or residential care
- **Unborn babies**, where there are known or emerging concerns about parental capacity, risk, or environmental factors

Children with Special Educational Needs and Disabilities (SEND)

Children with SEND can face unique safeguarding challenges. These may include:

- Assumptions that signs of abuse relate to the child's condition
- Increased social isolation
- Bullying or harm that goes unnoticed
- Communication difficulties or inability to report harm
- Not recognising or disclosing abuse or exploitation

The College provides additional pastoral support and communication strategies for learners with SEND. (See **Appendix 3, Section 14**)

Looked After Children, Care Leavers, and Students with a Social Worker

The College recognises the increased vulnerability of **looked after children**, **care leavers**, **previously looked after children**, and those with an **allocated social worker**. These learners may face barriers to learning, behaviour, attendance, and mental health, and are at greater safeguarding risk.

The College's **acting Designated Teacher**, **John Pratt**, promotes the educational achievement of these students, including those adopted from care or subject to special guardianship or child arrangement orders. Details can be found in **Appendix 2**.

The Designated Teacher is appropriately qualified and receives regular training to remain effective in this role.

The College recognises the issues surrounding **Children living in kinship care (formal or informal):**

- The College recognises that safeguarding guidance **explicitly applies to children living with extended family**, including informal kinship arrangements, recognising they may experience **hidden vulnerability** and inconsistent support

- The College will **identify and understand family context**, not assume stability because the child is not "looked after"

- Urge staff to be vigilant for changes in carers, financial strain and complex trauma histories and the College will work proactively with Family Help/Early Help where support is needed.

Responding to welfare/safeguarding concerns of as child/young person

1. Report safety or well-being concerns to the student's Lead Tutors or the Safeguarding and Pastoral Support Manager who may speak to the child/young person and their parents/carers unless to do so would compromise the safety or wellbeing of the child/young person.

2. Open a **Safeguarding Concern** for any student on the Staff Portal, detailing information regarding the nature of the concern, and sending this to the student's Lead Tutor of the Safeguarding and Pastoral Support Manager so that appropriate action can be taken. For those members of staff who do not have access to the staff portal they will be required to complete Form 1 in order to report a safeguarding concern for action and consideration and so that a formal record of that concern can be kept . A copy of Form 1 can be found in **Appendix 6**.

If a child or young person is deemed to be in need, or there is a suspicion they are suffering or likely to suffer significant harm, a referral will be made by the student's **Lead Tutor** or the **Safeguarding and Pastoral Support Manager/Deputy Designated Safeguarding Lead** to the relevant **social care team** based on the student's age and location. The **Police** may also be contacted if the concern warrants it.

*See **Appendix 4** for a safeguarding/child protection flow chart.*

In **emergencies** or if there is a **genuine concern** that appropriate action has not been taken, staff can contact:

- **MASH (Children's Social Care):** (01432) 260800
- **Adults' Social Care:** (01432) 260100
- For referrals outside Herefordshire: www.gov.uk/report-child-abuse-to-local-council

If a staff member feels unable to report concerns to a designated safeguarding lead, they may use the College's **whistleblowing procedures** (available via the staff VLE).

Alternatively, national whistleblowing channels include:
Advice on Whistleblowing
NSPCC Helpline: **0800 028 0285** (8:00 AM – 8:00 PM, Mon–Fri)
help@nspcc.org.uk

"*Significant harm*" is defined as serious ill-treatment or the impairment of health or development (Children Act 1989)

Advice on how to respond to and record a disclosure

- **RECEIVE** what is said.
  - Accept what is said – you do not need to decide whether or not it is true.
  - Listen without displaying shock or disbelief.

- **REASSURE** the student.
  - Acknowledge his/her courage in telling.
  - Not promise confidentiality.
  - Remind him/her that he/she is not to blame – avoid criticising the alleged perpetrator.
  - Not promise that "everything will be alright now" (it might not be).

- **REACT** and respond to the student but do not interrogate him/her;
  - Avoid leading questions but ask open ended ones (such as Tell me.., Explain…, Describe… etc.);
  - Clarify anything you do not understand.
  - Explain what you will do next.

- **RECORD** the discussion.
  - Record of what was stated as soon as possible – during the interview if you can;
  - Name of student
  - Time;
  - Date;
  - Place;
  - Student's own words as to what was said
  - Describe observable behaviour.
  - Do not destroy your original notes – they may be needed later on and should be passed to the DSL/DDSL.
  - Summarise details of the safeguarding concern by opening
  - Open a safeguarding concern against the student's profile from the staff portal, including the appropriate Lead Tutors in the concern.

- **SUPPORT** the student:
  - consider what support is needed for the student; ensure you are supported – such interviews can be extremely stressful. Support can be accessed through the Safeguarding and Pastoral Support Manager or College Counselling service
  - Immediately talk to the student's Lead Tutors or to the Safeguarding and Pastoral Support Manager/Deputy Designated Safeguarding lead if they are not available to pass on the concerns and your record of the concerns raised.

Family Help and Family Help Assessment

Early identification and support for children/young people in need is essential to prevent issues escalating. Family help means providing support as soon as a problem emerges at any point in a child's life.

The College works with a range of external and internal early help services, including counselling, a student mental health and wellbeing advisor, college chaplain, and physical wellbeing manager. The College's **Family Help Offer** is available on the website.

A **Family Help Assessment (previously EHA)** helps identify support needs and coordinates a family support plan. It considers all aspects of a child's development, including health, education, housing, and relationships.

The **Lead Tutors** or **Safeguarding and Pastoral Support Manager** assess the need for an EHA, overseen weekly by the **Designated Safeguarding Lead**.

For more on EHAs via the **Herefordshire Safeguarding Children's Partnership**: https://www.herefordshire.gov.uk/family-support/becoming-a-parent/early-help-and-support-for-families-in-herefordshire/

If the student resides in another area, local procedures will apply. Cases are regularly reviewed and referred to social care if necessary.

The College is alert to the potential need for Family Help for a child who:

• is unborn • is disabled • has special educational needs (whether or not they have a statutory education, health and care (EHC) plan) • is a young carer • is bereaved • is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime; • is frequently missing/goes missing from care or from home • is at risk of modern slavery, human trafficking, sexual and/or criminal exploitation • is at risk of being radicalised • is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online • is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse • is misusing drugs or alcohol themselves • is suffering from mental ill health • has returned home to their family from care • is a privately fostered child • has a parent or carer in custody • is missing education, or persistently absent from school, or not in receipt of full-time education • has experienced multiple suspensions and is at risk of, or has been permanently excluded

Escalation procedures

If appropriate action has been taken, but there are concerns about the response of another agency following a referral, the College is able to refer to the Herefordshire Safeguarding Children and Young People Partnership guidance which supports the resolution of case disagreements and further information and guidance regarding this process can be accessed via the West Mercia procedures for resolution of disagreements with professionals which can be accessed via the following link:

Professional Differences Policy Multi-Agency Resolution Protocol/Guidance - New June 2020

Information Sharing

Research and experience show that protecting children and young people requires timely sharing of relevant information about their health, development, and any risk of harm. If a staff member has concerns about a student's welfare, they must inform the **Lead Tutors** or the **Safeguarding and Pastoral Support Manager** to ensure appropriate support is provided.

The Data Protection Act 2018 and *UK GDPR* do not prevent the sharing of information when it is necessary to safeguard children. Staff must act in the child's best interests and can share information without consent if it is not safe or appropriate to gain it.

For further guidance, staff and governors should refer to:
DfE Data Protection guidance for schools

This guidance supports compliance with data protection law, outlines what data to retain, and promotes best practices for avoiding personal data breaches.

Reporting and Dealing with an Allegation Against a Member of Staff, Governor, or Volunteer

Allegations That Meet the Harms Threshold

Abuse is a serious matter that can lead to criminal conviction. If concerns arise about a staff member or volunteer, **Part 4** of the statutory guidance *Keeping Children Safe in Education* must be followed, along with the **local safeguarding children partnership** procedures.

Staff with concerns about the conduct of a colleague or volunteer should consult the College's **Whistleblowing Policy and Procedures**, which outline the process for addressing suspected malpractice.

The following guidelines apply:

All allegations of abuse by staff, governors or volunteers will be taken seriously and managed in line with *Keeping Children Safe in Education* and the **Herefordshire Safeguarding Children Partnership** procedures.
LADO / Managing Allegations (procedures.org.uk)

These procedures apply if a person working at the College (including governors and volunteers) 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 in a way that indicates they may pose a risk of harm to children;
- Behaved in a way (including outside College) that suggests they may not be suitable to work with children (*transferable risk*).

2. **Allegations** or concerns about staff, governors, or volunteers must be reported to the **Principal**. If the concern is about the Principal, it must be referred directly to the **Chair of Governors**.
3. The Principal will **immediately contact the Designated Officer (LADO)** to discuss the allegation, its context, and agree next steps.
4. The Designated Officer will guide on three strands:
    - Police investigation of a possible criminal offence;
    - Enquiries by **Children's Social Care**;
    - Disciplinary action, including potential suspension.

5. The College's **Head of Human Resources** will ensure the subject of the allegation is kept informed of developments and receives appropriate support. Union members will be encouraged to seek representation.
6. The College will make **every effort to maintain confidentiality** and guard against unwanted publicity during investigations.
7. Allegations will be pursued **regardless of resignation or withdrawal of services** by the accused individual.
8. The College will **not enter into "compromise agreements"**, which allow resignation without disciplinary action or referral, accompanied by agreed references.
9. The College will fully **cooperate with the Designated Officer**, strategy discussions, and follow information-sharing protocols.
10. If an allegation is **substantiated**, the College will ensure appropriate referrals are made—most notably to the **Disclosure and Barring Service (DBS)** for individuals who:
    - Have harmed or pose a risk of harm to a child or vulnerable adult;
    - Meet the *harm test*;
    - Have been convicted or cautioned for a relevant offence;
    - Have been, or would have been, removed from regulated activity.
11. If the individual is **cleared to return to work**, the College will assess how best to manage the return, including stress management and reintegration support.
12. If the allegation is determined to be **false**, the Designated Officer may refer the case to **Children's Social Care** to assess whether the child is in need or has been abused by someone else.
13. After each case, **management and governors** will review lessons learned and implement appropriate improvements.

Concerns that do not meet the harms threshold: Low Level Concerns

Concerns that do **not meet the harms threshold** may arise from various sources—suspicion, complaint, disclosure by a child, parent, or adult (internal or external), or vetting checks. The College promotes an open, transparent culture where all concerns about any adult working in or on behalf of the College (including supply teachers, volunteers, and contractors) are addressed promptly and appropriately.

What is a Low-Level Concern?

A ‘low-level’ concern refers to behaviour that does **not meet the threshold** in paragraph 433 of *Keeping Children Safe in Education (2025)* but may still be inappropriate.

A low-level concern is any behaviour—no matter how minor or uncertain—that:

- Is inconsistent with the staff code of conduct (including outside-of-work behaviour); and
- Does not meet the allegation threshold for referral to the LADO.

Examples (from *Keeping Children Safe in Education 2025*) include:

- Being over-friendly with children;
- Having favourites;
- Taking photos of children on a personal phone;
- One-to-one engagement in secluded spaces;
- Using inappropriate, sexualised, or offensive language.

These behaviours may range from thoughtless or inappropriate actions to behaviour that could signal risk or intent to harm.

Reporting Low-Level Concerns

All low-level concerns must be reported to the **Principal**, who will record and act as appropriate. This promotes a culture of openness and ensures that staff behaviour aligns with the College’s values and staff code of conduct, while also protecting staff from false allegations or misunderstandings.

How to Share a Low-Level Concern:

1. Report in writing to the Principal, including details and context.
2. Anonymity will be respected where possible, though names must be recorded.
3. Records will be kept securely in line with *UK GDPR* and the *Data Protection Act 2018*.
4. Concerns will be retained until the subject leaves employment.
5. Concerns about supply staff or contractors must also be reported to their employer.

Staff are encouraged to **self-refer** if they believe their behaviour may be misinterpreted or falls below expected professional standards.

Records will be regularly reviewed by the Principal to identify patterns. Where concerning behaviour escalates to meet the harms threshold, it will be referred to the **LADO** and dealt with via formal procedures.

Safer Recruitment – Recruitment and Selection Procedures

Hereford Sixth Form College follows safer recruitment practices in line with *Keeping Children Safe in Education (Sept 2025)* to ensure the safety and welfare of students. These procedures apply to all staff and volunteers who may work with children.

Recruitment procedures include:

- Clearly defining the post or role;
- Identifying key selection criteria;
- Advertising widely to attract diverse applicants;
- Requiring documentary evidence of qualifications;
- Obtaining professional and character references;
- Conducting online searches as part of due diligence on shortlisted candidates to identify any publicly available concerns (candidates are informed in advance);
- Verifying previous employment history;
- Using varied selection techniques (e.g. interviews, checks, references).

All appointments are subject to an enhanced *DBS* check. Governors must have an enhanced *DBS* certificate. Those appointed to teaching roles must undergo an additional check for teaching prohibition. Roles with management responsibility (e.g. governors, senior leaders, heads of department) require a *Section 128* check to ensure they are not barred from such positions.

At least one member of any recruitment panel will be trained in safer recruitment.

If a member of staff starts work before their *Enhanced DBS Disclosure* is received, a risk assessment will be conducted. If the Principal deems the risk **minimal**, restrictions will apply until the DBS check is cleared, such as:

- Supervision at all times;
- No 1:1 student contact unless supervised;
- Open-door policy for any enclosed space;
- Wearing an ID badge at all times;
- Restricted work hours (e.g. outside student presence for cleaning staff).

No staff assessed as **medium** or **high** risk will be allowed to start work.

For supervised volunteers not in “regulated activity,” the College ensures:

- Supervision by someone in regulated activity;
- Supervision is regular and day-to-day;
- Supervision is reasonable to protect children.

(*Regulated activity* is defined in *Schedule 4 of the Safeguarding Vulnerable Groups Act 2006*, amended by the *Protection of Freedoms Act 2012*—see: HM Government Factual Note on Regulated Activity).

All employees must immediately report to the Principal any new convictions, cautions, or investigations during employment. Failure to do so may result in disciplinary action.

Staff must follow the **Staff Code of Conduct**, accessible on the VLE and updated annually.

Professional Learning: Staff Training and Development

New staff complete safeguarding training and receive:

- The **Safeguarding and Child Protection Policy**;
- The **Staff Code of Conduct**;
- *Keeping Children Safe in Education Part 1 (Sept 2025)*, including **Annex A**.

Annual refresher training and updates via meetings, emails, and bulletins ensure staff remain informed and equipped to safeguard students effectively. Safer recruitment training is provided to relevant staff and governors involved in hiring.

Educating Students – The Curriculum

Students are taught about safeguarding, including online safety, through a broad and balanced curriculum. The **Impact tutorial programme** delivers compulsory sessions covering:

- Equality & Diversity
- Internet Safety inc the dangers of AI, conspiracy theories and misinformation
- Safe Relationships including misogyny
- Sexual Health
- Mental Health
- Drugs & Alcohol Awareness
- Healthy Living
- Careers Education

These sessions help students recognise risks and know how to seek help when needed.

Use of the College Estate

Where the College estate is used for non-college activities, those providers are expected to meet the guidance in Keeping Children Safe in Out of School Settings (see paragraph 167).

If the College receives allegations related to an incident that 'happened when an individual or organisation was using the premises for the purposes of running activities for children...we will follow College safeguarding policies and procedures, including informing the LADO if appropriate. (see paragraph 377)

This is reflected in the College's *Lettings Policy and Procedures*.

Monitoring and review

Hereford Sixth Form College will be responsible for monitoring this policy.
This policy will be reviewed on an annual basis and reported to the Corporation for approval

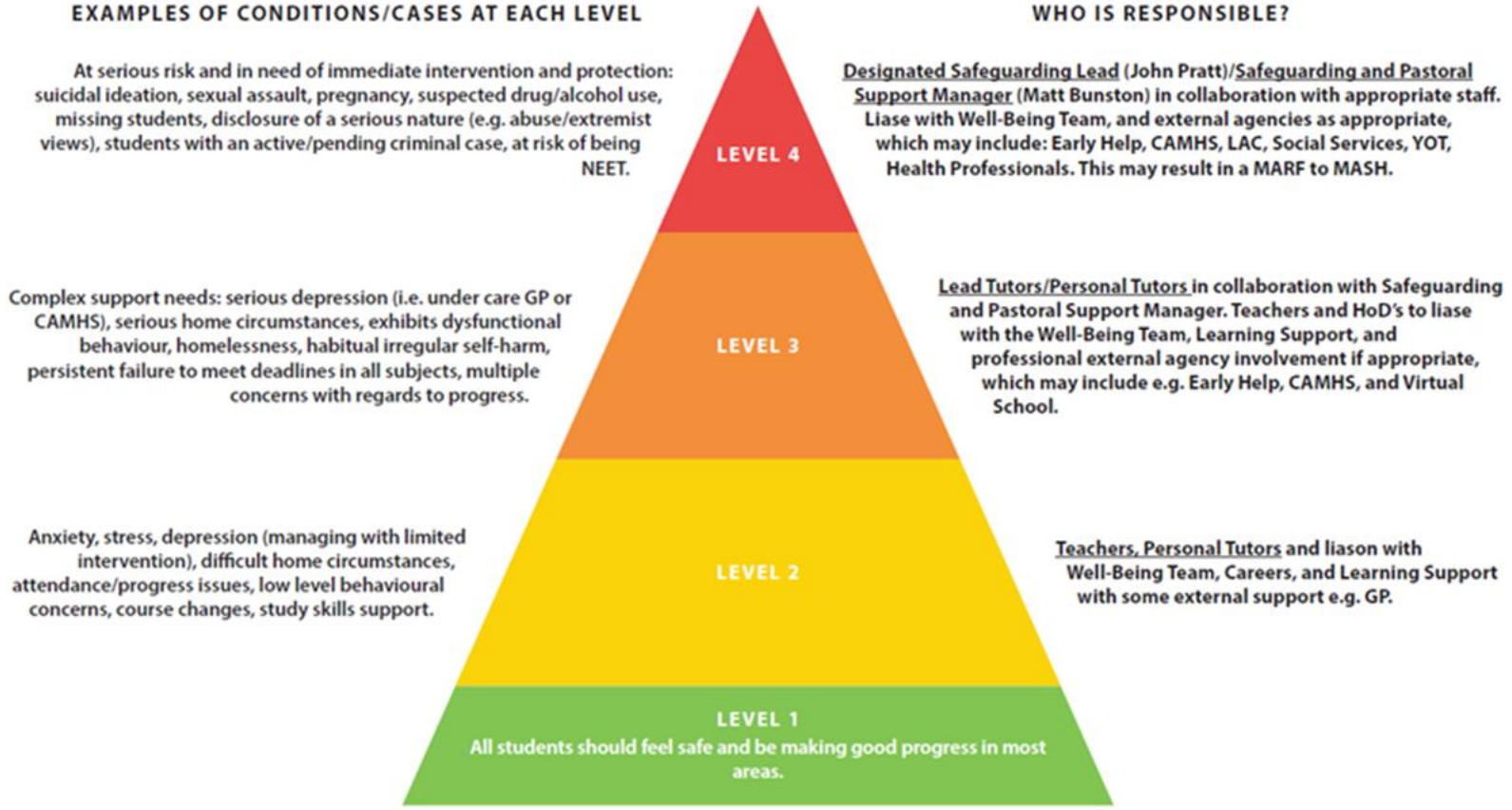
Other related College policies and procedures:

- *Peer on Peer Abuse Policy*
- *Complaints against the College Procedures*
- *Staff Code of Conduct*
- *Health and Safety Policy and Procedures*
- *Data Protection Policy*
- *Access to College Information Policy*
- *Disciplinary (Senior Post holders) Procedures*
- *Disciplinary (Staff) Procedures*
- *Equality, Diversity and Inclusion Policy and Procedures*
- *Prevent Strategy*
- *Whistle Blowing Policy and Procedures*
- *First Aid Policy and Procedures*
- *Substance Misuse Policy and Procedures*
- *Trips and Visits Policy and Procedures*
- *Work Experience Policy and Procedures*
- *Tutorial Policy and Procedures*
- *Exclusion Policy and Procedures*
- *Student behaviour, absence and review Policy and Procedures*
- *Anti-bullying and Harassment Policy and Procedures*
- *Health, Well-being and Fitness to study Protocol*
- *Run, Hide, Tell Procedures*
- *IT Acceptable Usage Policy and Procedures*
- *Online Safety Policy and Procedures (Staff and Learner documents)*

(To be approved at the October 2025 Local Governing Body meeting)

Pastoral and Safeguarding Support at Hereford Sixth Form College

RESPONSIBILITIES FOR SUPPORT AND INTERVENTION



tes fe awards 2016 | Winner Sixth form college of the year

StaySafe

Hereford SIXTH FORM COLLEGE

Appendix 1 - Levels of Safeguarding Needs:

APPENDIX 2

DESIGNATED PERSONS WITH RESPONSIBILITIES FOR SAFEGUARDING AND CHILD PROTECTION ISSUES

Designated Safeguarding Lead:
John Pratt
Email: **jpp@hereford.ac.uk**

Deputy Designated Safeguarding Leads:
Matt Bunston (Safeguarding and Pastoral Support Manager)
Email: **matt.bunston@hereford.ac.uk**

Phil Tranter (Deputy Principal)
Email: **pjt@hereford.ac.uk**

Gemma Cosgrove-Ball (Lead Tutor) **g.cosgrove-ball@hereford.ac.uk**
Jade Finney (Lead Tutor) **j.finney@hereford.ac.uk**
Jo Peters (Lead Tutor) **joanne.peters@hereford.ac.uk**
Jules Price-Hutchinson (Lead Tutor) **j.price-hutchinson@hereford.ac.uk**

Nominated Governor:
Catriona Ward

Designated lead teacher with responsibility for children looked after/care leaver:
Matt Bunston (Pastoral and Safeguarding Manager)
matt.bunston@hereford.ac.uk

Single Point of Contact for Prevent (SPOC) is:
John Pratt
Email: **jpp@hereford.ac.uk**

APPENDIX 3

Types of Abuse, Neglect, and Specific Safeguarding Issues

The College uses the term *victim* for those subjected to abuse, while recognising not all individuals identify with the term. *Perpetrator* or *alleged perpetrator* refers to the person responsible for harm, acknowledging they may also need support. This aligns with guidance in *Keeping Children Safe in Education (Sept 2025)*.

1. Sexual Abuse

Sexual abuse involves forcing or enticing a child into sexual activities, with or without physical contact, and whether or not the child is aware. This includes rape, touching, masturbation, or grooming. Non-contact abuse includes exposing children to sexual acts or encouraging inappropriate behaviours. Abuse may occur online. Perpetrators can be male or female, adults or children (peer-on-peer abuse). See the College's Peer-on-Peer Abuse Policy for further details.

2. Physical Abuse

Includes hitting, shaking, throwing, poisoning, burning, drowning, suffocating, or causing physical harm. It also includes fabricating or inducing illness.

3. Emotional Abuse

Persistent ill-treatment that harms emotional development. This may include conveying worthlessness, silencing, bullying (including cyberbullying), unrealistic expectations, or witnessing abuse. Emotional abuse is involved in all types of maltreatment.

4. Neglect

Persistent failure to meet a child's basic needs, risking harm to health or development. This includes lack of food, clothing, supervision, medical care, or emotional support. Neglect may begin prenatally due to maternal substance abuse.

5. Additional Safeguarding Concerns

Keeping Children Safe in Education (Sept 2025) outlines other safeguarding issues. For more, see KCSIE Guidance.

Key areas include:

- Bullying (incl. cyberbullying)
- Disinformation, misinformation and conspiracy theories
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM): Illegal in the UK. Mandatory reporting applies for staff suspecting FGM on girls under 18.
- Forced marriage: Since *February 2024*, any attempt to cause a child to marry under 18 is a crime, including non-legally binding ceremonies.
- Honour-based abuse (HBA): Includes FGM, forced marriage, and breast ironing.
- Gangs and youth violence
- Mental health
- Prevent duty
- Sharing nudes and semi-nudes
- Homelessness
- Trafficking

Contextual Safeguarding

Staff must assess environmental factors that may pose a threat to a child's welfare. See: Contextual Safeguarding. Abuse rarely exists in isolation. Most safeguarding cases involve multiple, overlapping issues requiring a holistic and informed response

6. Radicalisation

The *Counter–Terrorism and Security Act 2015* places a duty on Sixth Form Colleges to have "due regard to the need to prevent people from being drawn into terrorism." This is known as the *Prevent Duty*.

The Designated Safeguarding Lead (see **Appendix 1**) act as the **Single Point of Contact for Prevent** and is member of the Herefordshire Prevent Panel.

The College has a separate Prevent Strategy (available on the VLE under Staff Policies and Procedures: Safeguarding – Prevent Strategy) outlining its responsibilities under the *Prevent Duty*.

Children and young people are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, protecting students from these threats is part of the College's wider safeguarding approach.

Definitions from *Keeping Children Safe in Education (2025)*:

- **Extremism**: Vocal or active opposition to fundamental British values, including democracy, rule of law, liberty, and tolerance; includes calls for violence against armed forces.
- **Radicalisation**: The process by which someone supports terrorism or extremist ideologies.
- **Terrorism**: Violent acts intended to influence government or intimidate the public for political, religious, or ideological aims.

Indicators of vulnerability may include:

- Identity or personal crisis
- Feelings of isolation or injustice
- Experience of discrimination, racism, or criminality
- Special Educational Needs affecting understanding or empathy

This list is not exhaustive, nor does it suggest all individuals with these experiences are at risk.
Staff must report concerns immediately to a student's Lead Tutor or the Designated Safeguarding Lead

7. Child Sexual Exploitation and Child Criminal Exploitation

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

Exploitation may occur in exchange for something the victim needs or wants (e.g. money, gifts, affection), and/or for the perpetrator's financial gain or increased status. Children can be exploited by adults or other children, individually or in groups. In peer-on-peer cases, the perpetrator may also be a victim.

While age can play a role in an imbalance of power, other vulnerabilities include sexual identity, cognitive or learning difficulties, communication ability, physical strength, status, and economic access.

Indicators of exploitation may include:

- Unexplained gifts, money, or possessions
- Association with children involved in exploitation
- Emotional changes, drug/alcohol misuse
- Missing episodes or late returns
- Poor school attendance

CSE may involve one-off or repeated incidents and may include violence or threats. Additional CSE indicators include:

- Older boyfriends/girlfriends
- STIs, inappropriate sexual behaviour, or pregnancy

https://assets.publishing.service.gov.uk/media/5a7f8e3640f0b62305b87dbc/CSE_Guidance_Core_Document_13.02.2017.pdf

County Lines and Serious Violence

County lines refers to gangs exploiting children to move and sell drugs, often using coercion, threats, or sexual violence. Victims may be recruited in schools, homes, or online.

County lines indicators:

- Missing episodes, found far from home
- Involvement in drug transactions or serious violence
- Use of 'plugging' to conceal drugs
- Being found in 'trap houses' or hotels with drug activity
- Debt bondage or exploitation of bank accounts

Other signs include increased absence, changed friendships, poor performance, self-harm, assault injuries, or unexplained gifts.

KCSIE 2025 outlines risk factors including being male, frequent school absence or exclusion, maltreatment, or prior offending (e.g. theft or robbery).

- Advice to schools and colleges on gangs and youth violence - GOV.UK
- West Midlands Child Protection Procedures
- *Home Office: 'County Lines – criminal exploitation of children and vulnerable adults'*

8. Peer-on-Peer Abuse (Child-on-Child)

Peer-on-peer abuse can occur inside or outside college, or online. It may include bullying (including cyberbullying), physical abuse, sexual violence or harassment, upskirting, sexting, or hazing-type rituals.

KCSIE 2025 makes clear:

- Abuse should not be dismissed as “banter” or “part of growing up.”
- All concerns must be reported to Lead Tutors/DSL/DDSL.
- Abuse must be addressed using College Safeguarding, Child Protection, and Peer-on-Peer Abuse policies (available on Staff Portal/VLE).

Victims must be supported. Where appropriate, alleged perpetrators may also receive support to address behaviours and understand their impact. The Wellbeing Team offers confidential advice.

Sexual offences under the *Sexual Offences Act 2003* include rape, assault by penetration, and sexual assault. Abuse can occur between any children, in any setting, and may be one-on-one or group-based.

Sexual harassment includes:

- Sexual comments or jokes
- Physical interference or exposure to sexual content
- Online abuse, including sharing of sexual images, messages, coercion, or threats

All cases must be handled in line with *KCSIE 2025 Part 5*.

9. Youth Produced sexual Imagery

Youth produced sexual imagery refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs, via mobile devices or the internet by under 18s.

This includes:

- A person under 18 creating a sexual image of themselves and sharing it with another under 18
- A person under 18 sharing an image of another under 18 with someone else (including adults)
- A person under 18 possessing sexual imagery created by another under 18

It does not include:

- Sharing adult pornography
- Sharing sexual texts without imagery
- Adults sharing sexual imagery of under 18s (*this is child sexual abuse and must always be reported to police*)

“Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you’re under 18.”

Indecent images may include:

- Naked young people
- Genitals or sex acts (including masturbation)
- Overtly sexual images of young people in underwear

These laws aim to protect—not criminalise—young people. While illegal and risky, image sharing is often driven by curiosity or exploration. Young people need education, support, and safeguarding—not punishment.
The *National Police Chief's Council* states that youth produced sexual imagery should primarily be treated as a safeguarding issue. However, police may need to be involved where there are aggravating factors such as:

- Sharing imagery without consent
- Malicious intent
- Coercion

If consensual and without malice (e.g., in a relationship), the college may manage the incident directly.

Assessing Risk
Where no immediate referral to police/social care is made, the DSL/DDSL must assess risks by reviewing:

- Why the imagery was shared
- Whether the young person was coerced
- Who shared and where it was shared
- Whether the subject knew
- Any adult involvement
- Impact on those involved
- Additional vulnerabilities
- Understanding of consent
- Prior similar behaviour

Viewing the Imagery

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal** (see note below).

Staff should **not** view imagery. If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.
Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
Do not say or do anything to blame or shame any young people involved.
Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent)

Legal Powers to Search

The Education Act 2011, amending *the Education Act 1996*, permits authorised staff to examine and delete data from seized devices without parental consent. If material is suspected to be harmful, criminal, or a breach of discipline, staff can decide to retain or delete it and involve police if necessary.
Further guidance is available via:

- DfE Searching, Screening and Confiscation https://assets.publishing.service.gov.uk/media/62d1643e8fa8f50bfbefa55c/Searching__Screening_and_Confiscation_guidance_July_2022.pdf
- Sharing nudes and semi-nudes: advice for education settings https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview

10. Online safety

As the College increasingly operates online, it is essential to safeguard children and young people from harmful and inappropriate content. All staff share responsibility for fostering a positive digital culture. The College has mechanisms to identify, intervene, and escalate online safeguarding concerns.

Online safety risks are categorised into four areas (*Keeping Children Safe in Education 2025*):

- **Content**: exposure to harmful material such as pornography, racism, self-harm, radicalisation, mis and dis-information, conspiracy theories or extremism.
- **Contact**: harmful interaction, including grooming, peer pressure, or adult impersonation.
- **Conduct**: risky personal behaviour, e.g. sharing explicit images or online bullying.
- **Commerce**: threats like phishing, gambling, and scams. Report risks via the Anti-Phishing Working Group.

Appropriate filters and monitoring systems (e.g. Esafe) are installed on all College devices in line with *Keeping Children Safe in Education (Sept 2025)*. Students are taught online safety in group tutorials. A separate student *Online Safety Policy* is in place.

When delivering remote education, the College follows DfE advice on safeguarding in schools and colleges and updates staff policies accordingly.

The DfE filtering and monitoring standards are reviewed annually. We also use tools from SWGfL to assess filtering effectiveness and include updates in staff training.

Filtering and monitoring apply to generative AI as per KCSIE 2025.
https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations

11. Domestic abuse

The Domestic Abuse Act 2021 introduced the first statutory definition of domestic abuse and recognises children as victims if they see, hear, or experience its effects. It includes physical, emotional, economic abuse, and *coercive and controlling behaviour*, applying to individuals aged 16+ who are *personally connected*. Domestic abuse affects all identities and may occur inside or outside the home. *Teenage relationship abuse* (peer-on-peer) also requires safeguarding. The College follows safeguarding procedures to support both victims and perpetrators (*Keeping Children Safe in Education 2025*). *Operation Encompass* enables police to inform the DSL promptly, ensuring support while maintaining safeguarding referral duties.

More information: https://www.operationencompass.org/

Inter-familial harm
The College recognises the potential harm to siblings following incidents of abuse and the DSL or the Safeguarding and Pastoral Support Manager will share concerns with other agencies, as appropriate.

12. Mental Health

All staff understand that mental health issues may indicate a child has suffered, or is at risk of, abuse, neglect or exploitation. While diagnosis is for trained professionals, college staff can identify behavioural concerns. Adverse experiences, such as abuse or neglect, can impact mental health, behaviour and learning. If a concern involves safeguarding, staff must act immediately, follow College procedures, and seek early help or external agency support as needed.

The College's Mental Health Lead and Student Mental Health and Well-Being Advisor is Rosie Webley **rosie.laws@hereford.ac.uk**

13. Children who are LGBT or Gender Questioning

Being LGBT is not itself a safeguarding risk, but LGBT children may be targeted for abuse or bullying. A child perceived to be LGBT may face similar risks.
All LGBT students are assigned their Personal Tutor as a trusted adult.
Relationships and Sex Education includes LGBT content, and these themes are covered in the Tutorial programme.
The *Cass Review* recommends caution when supporting gender-questioning children due to unknowns about social transition and co-existing vulnerabilities (e.g. mental health needs, ASD, ADHD). The College follows:

- *Guidance for Schools and Colleges in relation to Gender Questioning Children https://consult.education.gov.uk/equalities-political-impartiality-anti-bullying-team/gender-questioning-children-proposed-guidance/*

14. Children with SEND or Medical Needs

Children with *SEND* or medical conditions face added safeguarding challenges. These include:

- Misattributing signs of abuse to their condition
- Isolation or bullying (including prejudice-based)
- Difficulty communicating or reporting harm
- Repeating online content without understanding risks

Reports involving SEND students require close liaison with the DSL or Head of Learning Support (DDSL). Extra support and communication resources must be provided.
Relevant guidance:

- *SEND Code of Practice 0–25 Years*
- *Supporting Pupils at School with Medical Conditions*
- SENDIASS – Find your local IAS service

APPENDIX 4

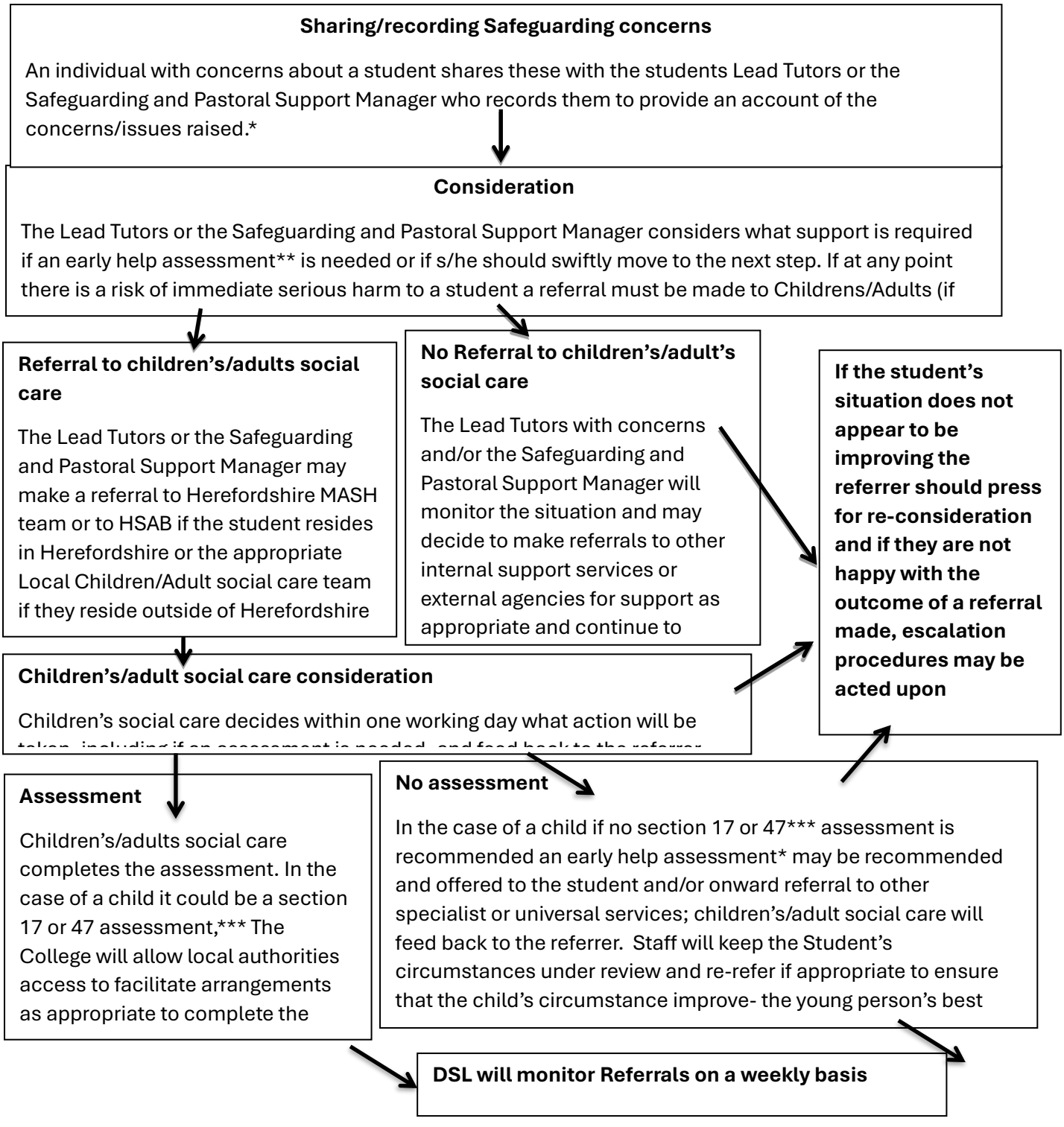
Acting on Safeguarding/Child Protection concerns raised

Key:

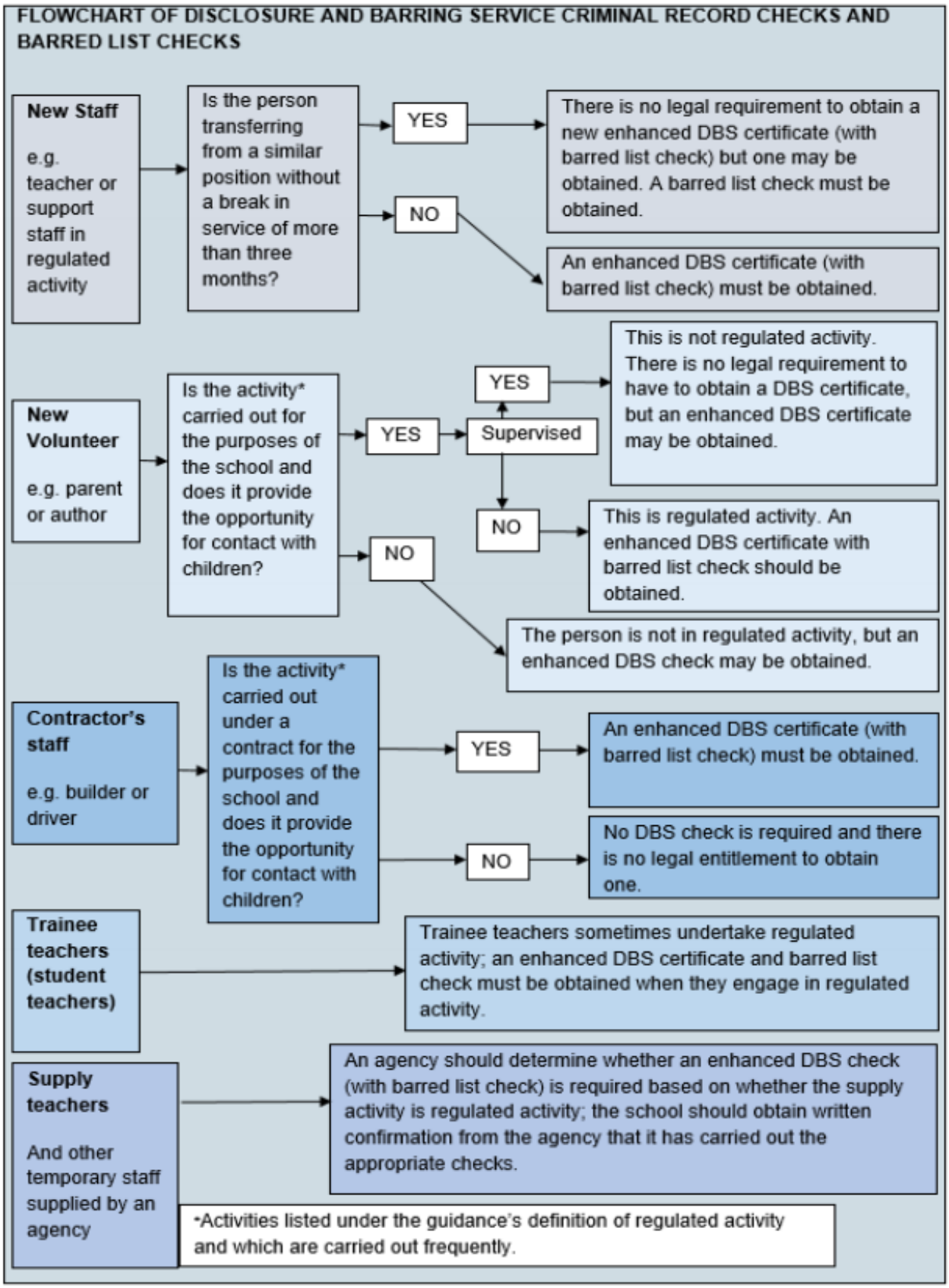
*In cases which involve an allegation of abuse against a staff member see page 12 - 14 of this policy for guidance which explains action the College will take in respect of the staff member.

**Where a family will benefit from coordinated support from more than one agency an inter-agency assessment may be completed (Family Help Assessment) with permission of the student. This assessment will be used to identify support needs of the student and the family to prevent further escalation of the situation

***Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (Children in Need). Where there are Child Protection concerns local Authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.



Appendix 5


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

Appendix 6

Initial report of a Safeguarding concern- Form 1

To be completed by the reporting member of staff or student.
To be signed and dated by them and passed to the Designated Person (Students Lead Tutors/DSL/DDSL) for secure keeping:

Student number: ***Staff name:*** ***Date and time:***
Facts – Who? What? Where? When? *In the case of disclosures, statements made in student's words where possible*
Observations (How did the student present? Any other observations?)
Agreed actions with the student (reassure the student, say who this be shared with)

Check that your statement is clear before signing it and passing it on to the Designated Person

Staff Signature: _____ Date: _____

Appendix 7

Useful Contacts, Resources and Websites:

Herefordshire Safeguarding Children Partnership:
https://herefordshiresafeguardingboards.org.uk/hscb (01432) 260119

Herefordshire Safeguarding Adults Board:
HSAB Website
Email - admin.sbu@herefordshire.gov.uk (01432) 260100.

Herefordshire Multi-agency Safeguarding hub (MASH)
In office hours: MASH (01432) 260800
Out of office hours: Emergency Duty Team (01905) 768020
Family Help hub: (01432) 260261

West Mercia Police:
Call 101 or 999 if student at risk of immediate significant harm

Designated Officer (LADO-Terry Pilliner) (01432) 261739
Email: lado@herefordshire.gcsx.gov.uk

Report child abuse to your local council:
www.gov.uk/report-child-abuse-to-local-council

NSPCC (**nspcc.org.uk**)
Helpline: 0808 800 5000

Wellbeing information and signposting for Herefordshire
https://www.wisherefordshire.org/

Guidance links:

- ***Working together to Safeguard Children 2024***
  Keeping children safe in education 2025
- ***What to do if you're worried a child is being abused: Advice for practitioners 2015:***
- ***Care and support statutory guidance - issued under the Care Act 2014:***
- ***Information sharing advice for safeguarding practitioners (July 2018)***

Ofsted – www.ofsted.gov.uk
Advisory, Conciliation and Arbitration Service (ACAS) www.acas.org.uk
Childline – www.childline.org.uk
Direct Gov for information relating to legislation – www.direct.gov.uk

Appendix 8

Recording Safeguarding & Child Protection

The Independent Inquiry into Child Sexual Abuse (IICSA) emphasized the importance of properly creating, maintaining, and retaining records to support victims and bring perpetrators to justice. Victims may take decades to report abuse. IICSA recommended:

- Retaining CSA records for 75 years.
- The UK government directs the ICO to create a Code of Practice on record retention and access.
  The Code should require institutions to have:
- Retention policies reflecting victims' long-term needs.
- Clear access procedures for survivors.
- Staff training to respond with empathy.
  Hereford Sixth Form College follows these recommendations despite no Code being published yet.

Statement of Intent

Hereford Sixth Form College is aware that creation, maintenance and retention of child protection, safeguarding and CSA records must be carried out with the understanding that access to records may be required many decades after records are created.

This document should be read in conjunction with the school's / Trust's Record Retention Policy. We review and update your Retention Policy as appropriate.

How to record safeguarding/child protection concerns.

Given these very long retention periods, Hereford Sixth Form College will ensure that safeguarding, child protection and CSA records are written in such a way as to be intelligible in the future and without any additional knowledge of the school, its staff, pupils or systems. Staff will be trained in good practice.
Our records will:

- Be written by the school's Designated Safeguarding Lead (DSL), Deputy (DDSL) or other suitably trained staff
- Identify the author by name and role
- Make clear it where the person who is recording the information is not the person who has seen or heard the issue, and identify all relevant parties by name and role
- Use full names of staff, other adults and parents/family members (full name in this context means first and surname)
- Ensure staff roles / job titles are included
- Ensure family relationships are clear
- Use full name of child whose record this is

- Use full name of any other child involved and ensure a mirror record is on their file, if appropriate

- Not use initials when recording names
- Where individuals have the same or similar names, ensure there is a distinguishing factor, eg middle name, job title, DoB etc
- Ensure all spelling, punctuation and grammar is correct.
- Use appropriate language to describe events, not slang, shorthand, local terminology or asterixis.
- Ensure quotes are properly identified as such and attributed to their owner
- Be objective and avoid opinion. If opinion is necessary, ensure it is identified as such and attributed to its owner.

How records are stored

Hereford Sixth Form College uses the Student Portal to record safeguarding information, supported by a Data Protection Impact Assessment and regular review. Privacy Notices on our website inform pupils, families, and staff. Related physical notes are securely retained.

The transfer of pupil safeguarding records

Keeping Children Safe in Education states the Designated Safeguarding Lead (DSL) must securely transfer the child protection file within five days of an in-year transfer or new term start, confirming receipt. At Hereford Sixth Form College, all pupil records—including safeguarding and *child sexual abuse* (CSA) files—are transferred securely, per *The Education (Pupil Information) (England) Regulations 2005*, without parental consent. Remaining records are deleted or retained per the College's policy, with minimal data kept for audit or administrative purposes. Safeguarding responsibility passes to the last known school; tertiary colleges receive but do not retain final responsibility.

Retention of Records relating to Staff

Hereford Sixth Form College retains staff records in line with its Record Retention Policy. Records relating to child sexual abuse (CSA) may be kept for up to 75 years. Basic details—such as name, role, contract dates, and safeguarding checks—may be retained longer for legal, safeguarding, or archival purposes, as outlined in the policy.