

Safeguarding Policy 2025–26 (incorporating Child Protection and Adults at Risk Procedures)

For the attention of: All Staff, Students, Visitors, Contractors
Produced by: Director of Safeguarding
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Vision, Purpose & Values

Our Vision

Our students will be recognised locally & nationally for their positive impact on the communities and industries in which they choose to work.

Our Purpose

To inspire our students to gain the skills, knowledge and behaviours they need to be resilient and thrive in an ever-changing world.

Our Values

Excellence: A culture of creativity, high expectations, ambition and aspiration

Respect: Showing fairness, courtesy and mutual respect to each other and our environment

Integrity: Honesty, openness and trust at the heart of College life

Diversity: Celebrating diversity and inclusivity as a key to our success

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Definition of Safeguarding

In line with 'Working Together to Safeguard Children' 2023 and Keeping Children safe in Education (September 2025), safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online

The Windsor Forest Colleges Group acknowledges that safeguarding includes a wide range of specific issues including, but not limited to:

- Abuse and neglect
- Bullying, including cyberbullying
- Child-on-child abuse
- Children with family members in prison
- Children who are absent or missing from education
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse

- Gender based abuse and violence against women and girls
- Harassment related to certain 'protected characteristics'/sexual harassment
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, also known as youth produced/involved sexual imagery or "Sexting"
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- 'Upskirting'

(Also see Part one and Annex B within 'Keeping Children Safe in Education')

1. Policy Outline

- 1.1. This Policy sets out the Windsor Forest Colleges Group's (WFCG)¹ overarching vision and commitment to safeguarding and child protection.
- 1.2. It describes our statutory duties, the legislative framework in which we operate and our expectations of staff and stakeholders to ensure appropriate and timely action is taken in the event of the disclosure of abuse.
- 1.3. The Policy includes the WFCG's position on the delivery and implementation of the Prevent Duty, which includes Fundamental British Values.
- 1.4. The policy includes the WFCG's position on the expectations of staff in relation to child-on-child abuse and on the support of children and "adults at risk" who have been abused.

2. Policy Statement

- 2.1. WFCG commits to provide a learning environment where everyone can learn, develop and progress effectively. This includes taking action to ensure all our students, but particularly children and adults at risk, feel safe and secure, know

¹ WFCG are Strode's College, Windsor College, Langley College, and Berkshire College of Agriculture

how to request and receive effective help if they are in danger, and learn how to keep themselves safe (including online). WFCG ensures a whole-college approach to safeguarding, aiming always to put safeguarding and Child Protection at the forefront of our work.

2.2. Additionally:

- 2.2.1. Safeguarding is recognised as everyone's responsibility. All staff, governors, volunteers, students, employers, and other stakeholders should play their full part in keeping children, vulnerable adults and the wider college community safe.
- 2.2.2. WFCG takes appropriate action to ensure all members of the college community stay safe during their time with us, including during offsite college-related activities, apprenticeships, industry placements and work experience. Additionally, WFCG aims to equip students to keep themselves safe outside of college and at home to ensure they have the best possible life and educational outcomes.
- 2.2.3. Everyone who comes into regular contact with children and vulnerable adults through WFCG is subject to employment checks and training, appropriate to their level of role and responsibility.
- 2.2.4. All staff, students and wider college users have a clear understanding of abuse and neglect in all forms; including how to identify, respond and report. This includes knowledge of the process for allegations against professionals.
- 2.2.5. Students, staff, Governors, and volunteers are confident that they can report all matters of a safeguarding nature to the safeguarding team, where the information will be acted upon swiftly and securely, following the correct procedures with the safety and wellbeing of the students at the centre of the referral process.
- 2.2.6. WFCG may choose to change, revoke or add to this policy and the procedures in order to keep our students safe in new circumstances dictated by arrangements required to manage risks around the ongoing pandemic. Any changes will be approved by the senior leadership team and the board of governors. The most recent versions, containing any such changes will be available on the staff intranet and the college website. Where appropriate, staff, contractors and students will be notified directly of changes in year.

3. **Scope**

- 3.1. WFCG has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all College users but in particular the children and vulnerable adults, who receive education and training through the College Group.

- 3.2. This Safeguarding Policy and Procedures applies to all staff, students, apprentices, and other College users; including volunteers, external contractors, and employers who take students for any form of work-based learning or work experience.
- 3.3. Throughout the Policy and Procedures, reference is made to College students. This term is used to refer to all students but with particular reference to those under the age of 18 years (children) and adults at risk.
- 3.4. An adult at risk refers to any person over the age of 18 who amongst other indicators:
- Has needs for care and support; is experiencing, or is at risk of, abuse and neglect; and as a result of those needs is unable to protect themselves.
 - Is or may be unable to take care of himself or herself.
 - Is or may be unable to protect himself or herself against significant harm or serious exploitation.
- 3.5. Other adults- we recognise we have adult learners who don't meet the definition of adult at risk but still need support and advice to keep themselves safe from harm. In such instances staff must still follow the WFCG Safeguarding policy. Here are some scenarios where we may be involved in safeguarding adult learners:
- Students who may be experiencing a mental health crisis or those who have a long-term mental health condition where this means they could pose an immediate or ongoing risk to themselves
 - Students who are victims of domestic abuse
 - Students who disclose that they have been victims of a crime (including historic offences) e.g. Female Genital Mutilation, sexual assault, physical assault, modern day slavery or human trafficking
 - Students who are vulnerable due to their circumstances e.g. homelessness, or adults with substance or alcohol misuse issues
 - Where an adult experiencing abuse is a parent, (or where they have care of a child) we also have a duty of care to consider if that child is safe.

Students at risk

WFCG recognises the importance of identifying vulnerable students that may be at risk of abuse, or that may have additional support needs.

WFCG recognises the following as vulnerable groups (although not exclusively):

- Students with Special Educational Needs (EHCP)*
- Adults at risk (vulnerable adults)*

- Students with caring responsibilities or classified as a young carer
- Looked after, previously looked after children and care leavers
- Students dealing with issues around domestic abuse
- Students experiencing bereavement
- Students with disabilities
- Students affected by mental health issues
- Students who are lesbian, gay, bisexual, or gender questioning
- Students on English for Speakers of Other Languages (ESOL) courses

*Children and adults with Special Educational Needs and Disabilities are subject to additional safeguarding challenges as they may have difficulties with communication, are at higher risk of peer group isolation and may be disproportionately affected by bullying. College staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

Pre 16 students

The College recognises the vulnerability of its youngest students (School links) and therefore implements additional measures to review and monitor their safety which includes but is not limited to designated space within each college and differentiated lanyards.

Safeguarding Apprentices

We take our responsibility to ensure the safety of our students very seriously. This also extends to our students who have chosen to study at our college as part of an apprenticeship programme. We are committed to working together to create a positive learning experience, and to ensure the highest levels of apprentice safety and wellbeing.

Employers have a duty to comply with all current and future UK legislation and statutory responsibilities. There is a particular expectation that an employer should take responsibility for an apprentice's safety and welfare in the workplace and to also seek appropriate advice when they feel an apprentice may be at risk in their personal lives. We appreciate that for many organisations this can be a confusing and complex area.

The Apprenticeship team will:

- Ensure that employers are aware of their safeguarding obligations, through guidance and training

- Ensure apprentices have an awareness of safeguarding and understand how to access college support services including how to report a safeguarding concern
- Maintain open channels of communication with each employer
- Include current safeguarding information in both the apprentice and employer handbooks.

The Employer will:

- Familiarise themselves with relevant government legislation
- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ
- Ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.

3.6. Our commitment to safeguarding is underpinned by the following legislation and guidance: Department for Education statutory guidance 'Keeping Children Safe in Education' (September 2025).

- Working Together to Safeguard Children' (2023).
- The Counter Terrorism and Security Act (2015).
- The Prevent Duty Guidance (2023)
- Serious Crime Act and the mandatory reporting of female genital mutilation (FGM) October (2015).
- The Anti-Social Behaviour, Crime and Policing Act (2014).
- The online procedures maintained by the relevant Local Safeguarding Partnerships for each of our individual sites.
- Guide to the General Data Protection Regulation (GDPR) March 2018
- Serious Violence Duty
- Equality Act 2010
- Legislation surrounding the safeguarding of vulnerable adults
- Meeting digital and technology standards in schools and colleges (March 2023)
- Safeguarding Vulnerable Groups Act 2006
- Online Safety Act (2023) [2025 Update]

4. Policy Details

4.1. WFCG provides a safe, non-threatening, inclusive environment in which all College users can operate and learn in an environment where they are treated with respect and dignity, feel safe, are listened to, where account is taken of their wishes and feelings and where positive well-being is promoted. Through the

provision of this environment, the College Group aims to develop students and staff who are confident, healthy, safe and emotionally resilient.

- 4.2. WFCG promotes a child-centred approach to disclosure and reporting, ensuring students and staff feel safe and confident to make disclosures and raise concerns.
- 4.3. The WFCG focus is on minimising the risk of harm to children and adults at risk, including the recognition of child-on-child abuse, and responding to this with the same commitment as with any other form of abuse. Staff will always act in the best interest of the students when responding to welfare concerns and will maintain an attitude of *"it could happen here"* where safeguarding is concerned.
- 4.4. WFCG is an intrinsic part of local communities and, as such, has strong relationships with external agencies. This includes Local Safeguarding Children and Adults Partnerships and Local Prevent Committees and delivery boards. These relationships allow the College to address local and national safeguarding priorities as well as accessing support to manage and reduce potential conflict within the College and help different groups of people to respect each other and celebrate difference.
- 4.5. The safeguarding teams within the Colleges recognise the importance of contextual safeguarding and of working with the police and other partners to understand the communities in which we are situated. It is also recognised that safeguarding practice, conversations, training, and learning must be flexible in order to respond to local concerns and emerging topics that impact on children and adults at risk. WFCG actively promotes Fundamental British Values in all of our work and gives our students the opportunity to mix and learn with, from, and about those from different backgrounds. (See Section 6 Radicalisation and the Prevent Duty).
- 4.6. WFCG is committed to delivering a safe online environment and promoting/supporting online safety. Using technology is an essential part of modern life but can present risks if people are not supported to recognise dangers and develop safety strategies. Information about the risks associated with online activity are embedded in the College mandatory safeguarding training for students and staff. Staff are also given guidance on how to conduct themselves professionally online, both on behalf of themselves and on behalf of the organisation, through training, a regular cross-college safeguarding bulletin and dedicated guidance.

4.7. The WFCG Corporation takes seriously its role in overseeing the College Group's arrangements for safeguarding and has a nominated Corporation member with lead responsibility for safeguarding.

4.8. **Implementation**

4.8.1. WFCG will ensure that:

- All new employees of the College, including apprentices and volunteers. will be subject to an Enhanced Disclosure via the Disclosure and Barring Service (DBS). Arrangements for this are set out in the Recruitment & Selection Policy and Procedure.
- Staff are introduced to safeguarding practice and to the policy and procedures via a range of development activities, including online courses, safeguarding training sessions, written briefings and cross-college team meetings. This supports an on-going dialogue around safeguarding, Prevent, British Values and related procedures, policies, and practices. As a result, they are confident to identify and report abuse in line with the safeguarding referral procedures.
- Procedures are in place to support all College users, particularly vulnerable groups of children e.g., looked-after children, children who are themselves carers, children on Child Protection or Child in Need plans, those with mental health challenges and students with additional learning difficulties and/or disabilities.
- Information technologies are used to guarantee that policies and procedures are accessible to all College users.
- ICT Acceptable Use policies are in place across the College Group. Internet usage by students and staff is proactively monitored (via keyword triggers) in order to detect any material promoting terrorism or posing a risk of radicalisation. Any concerns of this nature are managed by the safeguarding team with usual safeguarding/Prevent Duty reporting procedures applying.
- All staff, including Corporation members, volunteers, and people on work placement, should display or carry their official College photo ID badge on the relevant lanyard/holder at all times. This allows all College users to feel confident that they are in a safe environment and assists managers and security teams to identify and deal with any unauthorised visitors.
- Appropriate work is done to keep up to date, and work with the policies, procedures and working practices of the three safeguarding partners across all catchment areas. Relevant representation is in place in local networks, safeguarding partnerships and multi-agency training events and projects

4.9. Communication

- 4.9.1. Procedures are communicated to all staff through staff induction, staff briefings and the staff bulletin, staff intranet, email, meetings, training, and refresher training.
- 4.9.2. WFCG convenes a Safeguarding Steering Group as required to ensure the ongoing monitoring, development, and continuous improvement of the College Group's approach to safeguarding its users and implementing the Prevent Duty. This includes the monitoring of the College Group's Safeguarding and Prevent Action Plans. This group reviews safeguarding reports and data on a College Group basis and recommends actions accordingly. Safeguarding leads hold regular meetings with the safeguarding teams and other relevant staff on each College site
- 4.9.3. Staff and students' views are regularly sought regarding their safety at College/in the workplace through learner representative structures, surveys and discussion activity.
- 4.9.4. Job adverts have a clear statement reflecting the importance that the College places on safeguarding, and safer recruitment practices are always followed.
- 4.9.5. Safeguarding literature for staff and students promotes safeguarding across the College and beyond.
- 4.9.6. Opportunities are taken to teach students about safeguarding, including online safety, through induction, online courses, and activities as part of pastoral arrangements.
- 4.9.7. All employers are given access to the full College Safeguarding Policy and Safeguarding Procedures.
- 4.9.8. All students are actively encouraged to report any safeguarding, health and welfare issues through a planned and promoted self-referral process which is advertised across the College.

4.10. Radicalisation and the Prevent Duty

- 4.10.1. WFCG recognises the positive contribution it makes towards protecting students and staff from radicalisation and violent/hateful extremism through the implementation of the Prevent Duty. WFCG will work with students and staff to create communities that are cohesive, strong and joined by shared and understood values. It will put in place robust processes for supporting any learner who is identified as being at risk of radicalisation. All staff are required to

understand and take forward British Values in line with the College values and in all of their work.

4.11. Child-on-Child Abuse

- 4.11.1. WFCG recognises that child-on-child abuse is likely to be taking place in our colleges, even if it is not immediately visible or evident.
- 4.11.2. WFCG has a zero-tolerance approach to child-on-child abuse and employs a whole-college, child-focussed approach to creating and maintaining a culture that does not leave room for this abuse to take place.
- 4.11.3. Staff will be trained and reminded to spot the signs of child-on-child abuse and encouraged to reflect on their own biases and experiences to ensure that they are able to spot the signs that might indicate a concern, and to ensure that they are not downplaying relevant behaviours between young people and are challenging those behaviours where they arise.
- 4.11.4. See appendix I for more information, definitions and detailed expectations around staff actions

4.12. Serious Violence

- 4.12.1. WFCG recognises via experience, police intelligence and liaison with partner organisations that there are always likely to be significant numbers of young people within our colleges who have been affected by serious violence, directly or indirectly, in their communities. [Serious Violence Strategy](#)
- 4.12.2. WFCG and the safeguarding teams within it will work with the appropriate government guidance to support students in this position, to risk assess applicants to ensure we can keep them safe in our colleges and the wider college community.
- 4.12.3. WFCG will also work closely with the police to share information and to understand incidents and community issues that may impact on the college and its students and may expose to harm the college community

4.13. Responding to Safeguarding issues in our local Communities

- 4.13.1. WFCG is committed to responding appropriately and in a timely fashion to issues that affect the safety of our local communities and impact on our student groups, particularly the children studying in our colleges.
- 4.13.2. On occasions we will choose to change our curriculum or implement proactive unplanned activities to address local issues of concern, or to provide additional reassurance or education around a specific subject. This might include:

- Special assemblies or workshops to address a specific issue (e.g., youth violence or exploitation)
- Use of drug detection dogs for both educational work and direct screening
- Invitations to visiting speakers to discuss their personal experiences (e.g., honour- based abuse or radicalisation).

Appropriate Filtering and Monitoring

WFCG will do all we reasonably can to limit children's exposure to online risks through College provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.

- We use 'NetDNA' for internet filtering and control. All users are monitored with an extensive list of allow and block lists configured depending on what type of user is using the internet. Instant and daily reports of access to inappropriate sites is configured to alert key staff.
 - Keywords are reviewed and updated at select 'Safeguarding Meetings' meetings – where a record is kept on included/excluded words
 - In addition, NetSupport DNA is used to monitor keystrokes and computers displays. DNA works on a list of "words and phrases" that trigger an instant alert to key staff whenever they are "seen" or typed.
 - Software package AB Tutor is installed for windows computers across the Group, allowing teachers to effectively monitor computer usage in class
 - Where students discover undesirable content they should inform their teachers. Teachers should then raise the issue with IT support and the DSL/Senior Leadership Team.
 - The [UK Safer Internet Centre](#) has published guidance as to what "appropriate" filtering and monitoring might look like.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, WFCG will ensure that "over blocking" does not lead to unreasonable restrictions as to what students can be taught with regards to online teaching and safeguarding.

- WFCG acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
 - Students will use appropriate search tools, apps and online resources as recommended by the College Group
 - Safeguarding and appropriate filtering and monitoring mechanisms are of the highest priority when procuring and assessing new student facing tools, apps and resources
 - Students' internet use will be supervised by staff according to their age and ability.
 - Students will be directed to use age-appropriate online resources and tools by staff.

Information Security and Access Management

- WFCG is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and students. Further information can be found in the IT Security and Acceptable use policies.
- WFCG will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

5. Roles and Responsibilities

- 5.1. WFCG has a nominated senior leader with strategic responsibility for safeguarding. This person is also responsible for supporting and overseeing the operational safeguarding arrangements across the College Group. In addition, there is a DSL responsible for FE and one for 6th Form.
- 5.2. WFCG has in place a number of deputy DSLs, all of whom are trained to DSL standard and receive update training on a two-year cycle.
- 5.3. The Group Principal, Principals, Corporation and all staff working with or on behalf of the College, whether employed directly or indirectly, and including volunteers and external contractors who have regular contact with students, receive a level of training appropriate to their role, which will familiarise them with safeguarding issues, and clarify roles and responsibilities in line with the College policies and procedures. All staff undertake training each academic year, with other specific safeguarding training for front line staff available through the training schedule, which is recorded and monitored.

- 5.4. All staff know their responsibilities for recognising and reporting safeguarding concerns within their day-to-day practice. In addition, an 'open classroom' concept where learning walks are commonplace enables managers to support and monitor safeguarding arrangements.
- 5.5. All students understand their responsibilities for protecting their own safety and that of others and are actively encouraged to report any concerns.
- 5.6. All staff are required to complete mandatory safeguarding and Prevent training in order to understand their own roles and responsibilities and to become aware of the policies and procedures as set out in this and related documents. Staff are given information and training about extremism and radicalisation, including how to recognise the behaviours and ideologies considered to be extreme, and the responses required in terms of the usual safeguarding reporting procedures. They are also required to support and promote British Values in all of their work.
- 5.7. The Designated Safeguarding Lead and members of the safeguarding team are appropriately trained to respond to reported Safeguarding and Child Protection concerns, and have a working knowledge of appropriate referral pathways, for example Local Authority Social Care teams, Prevent teams, and Channel Panels.
- 5.8. The WFCG Corporation approves the annual Safeguarding Policy. The Corporation has nominated a Safeguarding Governor who provides support and challenge to College management.

6. Monitoring, Evaluation and Review

- 6.1. The policy and procedures are monitored on a termly basis by the Group Designated Safeguarding Lead and reviewed annually by the Senior Leadership Team
- 6.2. Regular reports and an annual report are provided to the board of governors via the Quality and Curriculum Committee and the Senior Leadership Team (SLT).
- 6.3. The College audits records related to employment checks annually. This includes regular random sampling of the College's Single Central Register held in Human Resources.

7. Associated Documents

- Acceptable Use of IT
- Complaints Policy
- Staff Disciplinary Policy and Procedure

- Staff Capability Policy and Procedure
- Relationships at Work Policy
- Health and Safety Policies and procedures
- Instruments and Articles of Government
- Keeping Children Safe in Education September 2025 (Department for Education)
- Recruitment and Selection Policy and Procedures
- Disclosure and Barring Service (DBS) Checks Policy and Statement on Recruitment of Ex-Offenders
- Student Contract
- Student Management Procedures
- Student Privacy Statement
- Working Together to Safeguard Children 2023 (Department for Education)
- Equality Act 2010
- Serious Violence Duty 2022 (updated June 2023)
- UK GDPR Policy
- External Speakers and Events Policy
- The Terrorism (Protection of Premises) Act 2025, also known as Martyn's Law, received Royal Assent on Thursday 3 April 2025.
- Online safety Act 2023

8. Glossary

- **DSL** – Designated Safeguarding Lead
- **DDSL** – Deputy Designated Safeguarding Lead
- **LADO** – Local Authority Designated Officer
- **MASH** – Multi-Agency Safeguarding Hub
- **SEND** – Special Education Needs and Disabilities
- **EHCP** – Education, Health and Care Plan
- **CME** – Children Missing Education

Appendix 1

CHILD-ON-CHILD ABUSE (PEER ON PEER for OVER 18)

Aims

This appendix aims to confirm the WFCG'S position on child-on-child abuse and provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is being abused, or is at risk of abuse from peers.

College Group Position

WFCG recognises that child-on-child abuse is likely to be taking place in our colleges, even if it is not immediately visible or evident.

WFCG has a zero-tolerance approach to child-on-child abuse

Staff must be able to spot the signs of child-on-child abuse and may need to reflect on their own biases and experiences to ensure that they are able to be part of the maintenance of a positive and safe culture/environment and identify behaviours that might indicate a concern.

Staff must ensure they are fully conversant with their responsibilities in relation to identifying, preventing and referring incidents of child-on-child abuse, are not downplaying negative behaviours between young people, and are challenging those behaviours where they arise.

What is child-on-child abuse?

Child-on-child abuse is abuse carried out between children (i.e., both perpetrator and victim are under the age of 18). It should be recognised by all staff that children can abuse other children.

It includes, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Harmful Sexual Behaviours including:
 - Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and/or harmful sexual behaviour); Sexual harassment, such as

sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Definitions

The key terms related to child-on-child abuse are defined as:

Child: Those under the age of eighteen

Vulnerable Adult: For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk²

Bullying: Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable, and helpless. Bullying can take many forms, including:

- Verbal: e.g., name calling, sarcasm, threatening & teasing
- Physical: e.g., pushing, hitting, kicking, punching or any use of physical aggressive contact
- Social: e.g., ignoring, spreading rumours, or treating someone like an outsider
- Psychological: e.g., stalking & intimidation

Cyber-bullying: 'Virtual' bullying using technology (e.g., chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can

² The Care Act 2014 defined a vulnerable adult or adult at risk as an adult who has needs for care and support; is experiencing, or is at risk of, abuse or neglect; and as a result of those needs is unable to protect themselves'.

happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily.

Sexting: Whilst professionals refer to the issue as 'sexting' there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating and sharing sexual photos and videos of under-18s, including selfies, is illegal.

Harassment: Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners

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

Sexual Harassment: Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone; interfering with someone's clothes.
- displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- Online sexual harassment may include:
 - Non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges).
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats.

Sexual Violence: Under the Sexual Offences Act 2003 sexual violence is described as:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

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

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape.

External guidance and Statutory Responsibilities

Keeping Children Safe in Education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up.'

The Equality Act 2010 requires the College to:

Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the act

Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it

Foster good relations between people who share a protected characteristic and people who do not share it

Other relevant information for defining, identifying and referring child on child abuse

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g., isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g., girls being touched, or boys being involved in initiation activities).

Bullying (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBT+), those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and the College takes its duty to protect more vulnerable learners very seriously.

Child on child abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to a Designated Person.

Actions and Expectations

The following actions must be taken by all staff:

All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken.

Staff must ensure ground rules are set during induction and that learners are made aware of the importance of adhering to Fundamental British Values, what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through Student Management Procedures.

Course leaders and pastoral tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse through Core Studies or equivalent pastoral work.

Staff receiving reports of abuse, including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which should be managed in line with the Student Management Procedures, but with advice from the duty safeguarding officer or DSL. Sanctions against perpetrators may include suspension whilst an investigation takes place and, in the most severe cases, permanent exclusion may be required.

Staff must ensure appropriate managers are notified. This includes the Additional Learning Support Manager for a learner under the age of 25 who is in receipt of an EHCP and/ or high needs funding.

All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and a member of the safeguarding team will advise if additional support is required.

A member of the safeguarding team will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police where a crime may have been committed, e.g., in the case of some types of harassing or threatening behaviour.

All allegations/incidents must be recorded, and learners involved told what is being recorded, in what context, and why.

Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding (unless this is likely to put the child/vulnerable adult at greater risk of harm). An agreement must be reached as to what action should be taken subject to compliance with the Student Management Procedures

The DSL/DDSL will make a referral to Children's Services if required.

Specific Actions in relation to Sexual Violence

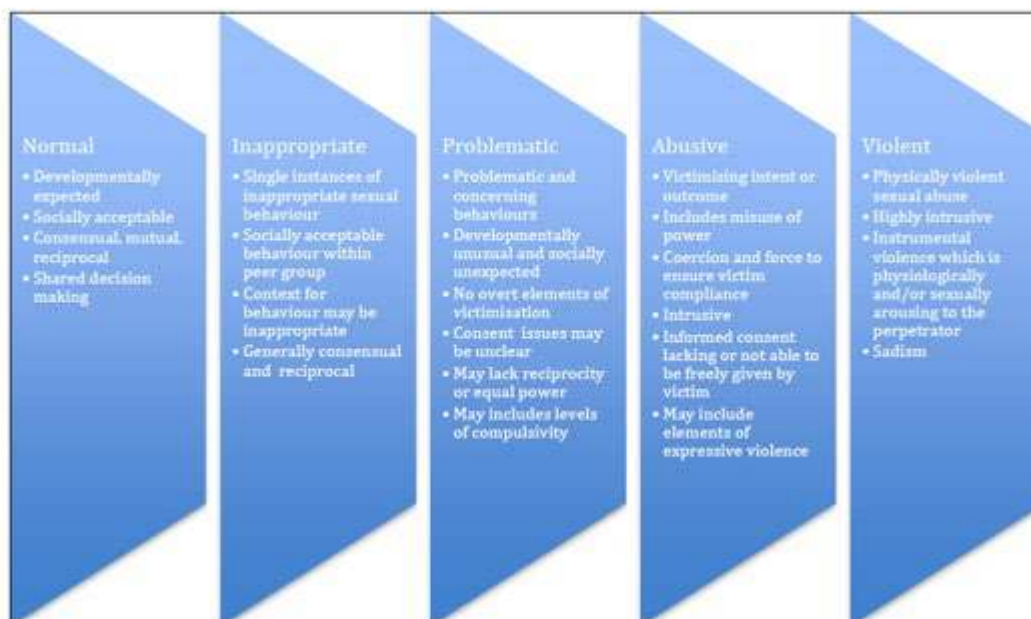
When disclosing experience of sexual violence, the victim may ask the college not to tell anyone about it. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The designated safeguarding lead (or a deputy) should consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care.
- Adults who disclose abuse and request that this not be reported to police or any other party can reasonably expect this request to be complied with. Staff must first ascertain whether there is any transferable risk to others (especially children) and whether the victim has mental capacity.

Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed ['Shore Space'](#), an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

Harmful sexual behaviours:



Safeguarding Procedure

Introduction

Safeguarding and promoting the welfare of our students is the responsibility of **all** staff at The Windsor Forest Colleges Group¹. This document sets out the detailed procedures that staff should follow in the event of a safeguarding or child protection concern.

It provides key information, updates and definitions that staff are required to be aware of and should be read in conjunction with the College's Safeguarding and Child Protection Policy (2025-26).

Our Safeguarding procedures are underpinned by statutory duties placed upon us by the Department for Education, the police and other government agencies. The two most important of these are:

[Keeping Children Safe in Education \(September 2025\)](#) sets out specifically the duties of education providers to keep children safe.

Part 1 of this guidance, 'Safeguarding Information for all staff' is a key summary. Each academic year all staff will update their safeguarding and child protection training by reading this summary and confirming agreement and understanding of its content and the College's safeguarding procedures.

[Working Together to Safeguard Children \(2023\)](#) sets out how organisations and individuals must work together (multi-agency work)- to safeguard and promote the welfare of children.

The College Group and its safeguarding teams also work in line with the procedures produced by the safeguarding partnerships of the local authority areas in which our students live and in which the colleges are based.

Defining Safeguarding and Child Protection

The difference between safeguarding and child protection

Often the terms *safeguarding* and *child protection* are used interchangeably, but they have different meanings, which all staff must understand.

Safeguarding

Safeguarding is the term used for the many different actions the College takes to ensure that **all** our students, irrespective of their ages or levels of vulnerability, are safe from harm and abuse.

Everyone working at our colleges has a statutory duty to safeguard and promote the welfare of **all** children under the age of 18.

Safeguarding and promoting welfare is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.

Child Protection

Child protection is a part of our responsibility to safeguard and promote the welfare of children. It refers to the statutory procedures we have a duty to use to protect specific children who are at risk of significant harm or abuse, or who have been harmed or abused.

These specific children may include, but are not limited to, those who disclose they have been affected by, or have experienced (or you have reason to believe have been affected by) one of the following:

- Physical Abuse
- Sexual Abuse
- Neglect
- Emotional Abuse
- Child on Child (or Peer on Peer for adults) Abuse
- Radicalisation or other concerns under the Prevent Duty
- Exploitation (including criminal, sexual)
- Forced Marriage and/or Honour Based Abuse
- Gangs and Weapons Violence or Serious Violence
- Sexting (also known as Youth Produced Sexual Imagery) and digital harms

Summary of Expectations and Legal Duties of all Staff

All staff (this includes teaching, assessors and support staff as well as contractors, volunteers and governors) who work in the college environment have a duty under law to report any concerns they may have about a child or adult at risk.

It is important that all children are protected from 'significant harm'. All complaints, allegations, disclosures of abuse or suspicions must be taken seriously and acted upon promptly.

Where a student under the age of 18, or an adult at risk, reports one of the above is happening to them, has happened to them in the past, is likely to happen to them in the future, or you witness something that makes you suspect they are at immediate or significant risk of harm, you must contact a member of the safeguarding team at your college immediately.

In most cases we will have a legal duty to report this to the appropriate agency (usually Children's or Adult Social Care and/or the police), we may also need to take action to protect the student and keep them safe in the meantime.

If a student aged 18 or over, who is not considered to be at risk is at risk of immediate or significant harm or makes a disclosure relating to one of the scenarios on the above list, you must still contact the safeguarding team. Our duties are different for those aged 18+, and information sharing must be handled differently, but the safeguarding team will make a decision about what we need to do.

All staff should be working in line with not only the statutory requirements set out in the guidance documents described above, but also with the College Group's stated position on Safeguarding and Child Protection, as set out in the Safeguarding and Child Protection Policy. This is accessible at any time on the College website and the Staff Intranet.

Why Safeguarding and Child Protection are Important

It is important for children and adults at risk to receive the right help at the right time to address risks and avoid issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective and timely action.

Effective safeguarding practice also significantly improves students' abilities to remain in learning, to maintain the concentration and interest to reach their potential, to achieve qualifications and to progress successfully to employment, training or higher education.

Poor practice includes failing to act on and refer early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

Procedures in Detail

The procedures set out below must be followed whenever an allegation, observation or disclosure is made that a child, or vulnerable adult has been abused or is at significant risk of harm, or when there is reasonable cause to believe that abuse has taken place or could take place.

As an exception, any disclosure, allegation or observation you need to refer which includes a **member of staff** as a potential perpetrator or as someone who is experiencing harm or abuse, should **not** be referred through the safeguarding team or the steps below, but be referred directly to the Group Director of People. If your concern is about the Principals, Vice Principals and Assistant Principals please go directly to the CEO. If your concern is about the CEO, please contact the chair of governors.

Low level concerns (see staff low level concerns Policy)

It may be possible that a member of staff acts in a way that does not cause a risk to students, but which nevertheless is concerning. A staff member who has a concern about another member of staff should inform the Associate Vice Principal (FE)/Principal (BCA & Slough and Langley), Principal (Strode's and Windsor), Assistant Principal- SS about their concern, using a Low-Level Record of Concern Form. If the above staff cannot be contacted, the Group Deputy Principal or CEO should be contacted instead. Members of staff have the right to remain anonymous as far as reasonably possible. If your concern is about the Principals or Group Vice Principal, please go directly to the CEO. If your concern is about the CEO, please contact the chair of governors.

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

STEP 1: Recognising Abuse and Significant Harm

Identification of abuse and 'significant harm' is not always straightforward. All staff should be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap.

The indicators below are not prescriptive or exhaustive and must be regarded in the context of the individual's usual behaviours and known contextual information about his or her life and habits.

If you are concerned someone might be being abused or at risk of significant harm, consider the following indicators:

- Has the usual/expected behaviour of the person changed, for example have they suddenly become withdrawn or aggressive? Is their behaviour unusual for their age and maturity?
- Have their friends told you they have a problem, but they can't tell anyone?
- Do they tell you a story about a 'someone they know' and ask your advice?
- Do they have friends in college? Could they be isolated by child on child abuse?
- Has behaviour previously been dismissed as 'normal' because they are from a particular culture? Abuse is not acceptable in the UK no matter the background, culture, faith or belief.
- Do you notice any physical signs of abuse such as bruises or other injuries?
- Have they become more secretive and distanced themselves from others?
- Do they have new friendship groups, or are suddenly in possession of expensive gifts or clothes?
- Has their use of the internet changed – are they spending more time online but it's unclear why? Or have you seen something concerning on their screen?

Remember that most of the indicators listed above could be signs of other concerns or turn out to be of no concern at all, but if you're worried you should always discuss your observations or suspicions with a member of the safeguarding team.

Abuse, neglect or exploitation are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse.

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Safeguarding procedures should also be followed when concerns are raised in relation to radicalisation and extremism.

Staff should be aware that behaviours linked to drug taking, alcohol abuse, College absence and negative or sexual behaviour online put children in danger.

STEP 2: Responding to an Allegation or Disclosure

If you have a concern that is beyond early intervention and pastoral solutions, where someone is potentially at risk of harm as described above, you should contact a member of the safeguarding team without delay.

Any suspicion, allegation, or disclosure of abuse or 'significant harm' must be reported immediately to the safeguarding team for your specific site. Speaking directly to a Designated Safeguarding Lead/Deputy Designated Safeguarding Lead is essential. Do not use email or voice mail.

Promises of confidentiality should not be given to the student, as matters may develop in which that promise cannot be honoured. If the student is a child or adult at risk, it is good practice to inform them as soon as possible that if they tell us/have told us they are at risk of harm, we may need to share that information with other agencies in order to ensure his or her safety.

Take the student seriously and listen without asking leading questions allowing a free recall and impromptu account in a non-judgmental way.

If the complainant is the student themselves, questions should be kept to the minimum necessary to understand what is being alleged. The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

A full written record should be made on CPOMS or a safeguarding concern form (if you don't have access to CPOMS – see appendix A and can also be found on the intranet: https://docs.google.com/document/d/1reujypGHHCUIJKXlu3yZlzh-OaSa_179/edit) as

soon as possible of the nature of the allegation, disclosure or suspicion, and any other relevant information including:

- Date and time
- Place where, and circumstances in which, the allegation or disclosure took place
- Names and ID numbers of all involved, including the complainant/person making the disclosure, the person who is subject to the harm or abuse, and any others who may be witnesses or may have knowledge of the case.
- The nature of the harm or abuse and a description of any injuries observed, and/or any relevant behaviours or impact
- A written account of the allegation or disclosure

STEP 3: Actions of the Safeguarding Team

Once you have made your referral to the safeguarding team, they will make a decision about the next steps, working always in the best interests of the student. Working in consultation with you as the referrer, and where possible with the student (if appropriate and safe to do so with their parent or carer), the DSL/DDSL will usually do one of the following:

- Make a multi-agency referral via the Multi-Agency Safeguarding Hub (MASH) at the appropriate local authority
- Make an immediate report to the police or PREVENT team followed up with a MASH referral
- Make a referral or seek advice from other agencies (e.g., drugs and alcohol support, the Forced Marriage Unit (FMU), or Early Help/Family Support Services)
- Advise that the case does not meet safeguarding thresholds and signpost you to the relevant pastoral member of staff.
- Advise that we are already aware of the student and the case and provide advice in relation to previous safety work or make a decision to re-refer externally

It is vital that following any referral, everyone works together to ensure the student remains safe in our care, that any formal safety plans are followed, and that systems are appropriately updated (both in terms of ensuring everyone who needs to know about the case has access to an appropriate level of information about it, and in ensuring that any contact details/emergency contacts are amended – for instance where a parent is potentially a risk to their child and are also the emergency contact we hold).

No one involved should ever assume a safeguarding case ceases to be relevant whilst the student remains enrolled within the College Group.

The designated safeguarding lead (or a deputy) should consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care;
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Other Considerations and Specialist Procedures

Taking Action if there is Immediate Danger

Staff, when deciding what action to take, will normally do this by referring their concern to a member of the safeguarding team as above.

If, however, a member of staff fears that a child/adult at risk is in immediate danger or at risk of serious harm and in the unlikely case that the DSL/DDSL is not available, a referral should be made to children's social care (directly to the local authority where the child lives) and/or the police immediately. This should only be done in very rare cases. The number to call can usually be found by carrying out an internet search for "Children's Services" + the name of the local authority.

Guidance makes it clear that anyone can make a referral. Where a referral is made by someone who is not a member of the safeguarding team a CPOMS incident should be completed and the DSL/DDSL should be informed as soon as possible that a referral has been made.

Confidentiality and Responsibility

At all times confidentiality will be paramount when handling cases of child and adult protection, with only essential personnel being notified.

Parents/carers may need to be involved but staff must be guided by the Safeguarding Team about who should do this. Consideration will need to be given to whether notifying parents or carers increases the risk of harm or is likely to undermine statutory processes.

The need to work in partnership with other agencies and individuals needs to be offset by the need to maintain the rights of privacy. Information should therefore be sought and shared only on a need-to-know basis, both within and outside of the College. Any information sharing which overrides the principles of GDPR must be backed up by clear evidence that it safeguards an individual and is necessary in order to prevent harm or further harm.

Disclosures Made Outside College Hours

It is unlikely that staff will receive a disclosure during College activities that are outside of core College hours, but if this does happen, procedures are in place.

Students at risk

The College recognises the importance of identifying vulnerable students that may be at risk of abuse, or that may have additional support needs.

The College recognises the following as vulnerable groups (although not exclusively):

- Students with Special Educational Needs (EHCP)
- Adults at risk (vulnerable adults)
- Students with caring responsibilities or classified as a young carer
- Looked after, previously looked after children and care leavers
- Students dealing with issues around domestic abuse
- Students experiencing bereavement
- Students with disabilities
- Students affected by mental health issues
- Students who are lesbian, gay, bisexual, or gender questioning
- Students on English for Speakers of Other Languages (ESOL) courses

The College recognises the vulnerability of its youngest students (School links) and therefore implements additional measures to review and monitor their safety.

Taking Action to Protect Yourself

It is important that staff understand the need to safeguard and protect themselves (for instance from misunderstandings or false allegations).

All communication and relationships between staff and students, including interactions online, should take place within clear and explicit professional boundaries and be transparent and open to scrutiny. To avoid any ambiguity of intention, staff must not, for example, give personal telephone numbers or personal email addresses to students.

Likewise, staff have a responsibility to ensure that their curriculum and related materials are suitable for a College setting and appropriate to the age group of students involved. For instance, ensuring that resources, texts, scripts etc are not going to cause trauma to those who may have been abused, and that appropriate support is in place and advice sought if class discussions or activities might be difficult for some students to manage.

Staff should always keep their line manager informed if conversations (in person or online) are starting to cause concern. For instance, students disclosing their personal problems to a member of staff can quickly turn into an attachment on the part of the student if not managed transparently or honestly. Tell your line manager and the

safeguarding officer if you think a conversation is getting out of hand or the student is forming an inappropriate attachment. Good Practice for staff:

DO

- Read and understand the College's safeguarding policy and procedures
- Know your responsibilities and duty of care
- Be alert to any concerns that relate to extremism and radicalisation or to child on child abuse, which must be reported to the safeguarding team.
- Refer on any concerns you have in person or by telephone to the Safeguarding Team immediately
- Be cautious of inappropriate conversations and relationships with students
- Use appropriate means of communication with students
- Set rules and expectations (including where and when you are available to students, and where and when you are not)
- Be consistent in how you build relationships with students, differentiate the support you give them, but avoid closer relationships with some, or special arrangements that could be interpreted as friendship or another type of relationship
- Always meet students individually in open areas or places where you can be seen by colleagues
- Be a role model and quash any inappropriate behaviours straightaway
- Know and understand the professional standards expected of you as a member of staff
- Think about how safeguarding can be built into your work wherever you are placed in the College

DON'T

- Delay following safeguarding procedures if you have a concern or receive a disclosure.
- Give your personal mobile or email to students, or interact with them on social media or any encrypted or unregulated platform
- Assume someone else is picking up the concern
- Promise not to tell someone else when someone makes a disclosure
- Change the way you communicate/interact with students if you have work online. Students should not be able to see into your personal life, dress inappropriately, or converse with you in the middle of the night, for instance, just because ways of working are remote
- Get involved in students' personal lives, or meet with them in social settings
- Investigate concerns or disclosures without the support and direction of a member of the safeguarding team

The Principal of FE is the Designated Safeguarding Lead (DSL) for the College Group.

BCA/Slough & Langley Colleges:

If you have a concern about a student or they disclose abuse, neglect, sexual violence, or sexual harassment speak to a member of the safeguarding team immediately (identifiable by an orange lanyard):

Laura Peters – Associate Vice Principal (FE) Julie Goodyear – Director of Safeguarding (DSL) and Wellbeing	
BCA: Estella Roberts (DDSL) Jacqueline Bell (DDSL) Kevin Ruan (DDSL/CLA Lead) E: safeguarding.bca@windsor-forest.ac.uk T: 01628 827531 Location: Learning Centre Out of hours follow the Out of Hours Procedure.	Slough & Langley College: Shaheen Arif (DDSL) Debbie Laflin (DDSL) Taryn Cole (DDSL/CLA Lead) E: safeguarding.fe@windsor-forest.ac.uk T: 01753 443850 Location: Student Services Out of hours follow the Out of Hours Procedure.

Follow the DSL/DDSL advice and add incident to CPOMS

In the unlikely event that you are unable to speak to a member of the safeguarding team and you are concerned about the safety of someone else, you should contact your local Children's or Adult Social Care Team.

If you or someone else is in immediate danger, call 999

BCA: Windsor and Maidenhead Children's Social Care – 01628 683150 (Mon–Fri 9am to 5pm) Adult Social Care – 01628 683744 (Mon–Fri 9am to 5pm) Emergency Duty Team (out of hours service) for children and adults – 01344 786543	Slough & Langley College: Slough Children's Social Care – 01753 875362 (Mon–Fri 9am to 5pm) Adult Social Care – 01753 475111 (option 1) (Mon–Fri 9am to 5pm) Emergency Duty Team (out of hours service) for children and adults – 01344 786543
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Strode's and Windsor Colleges:

If you have a concern about a student or they disclose abuse, neglect, sexual violence, or sexual harassment speak to a member of the safeguarding team immediately (identifiable by an orange lanyard):

Naomi Bailey – Assistant Principal Student Services (Sixth Form) (DSL)	
Strode's College: Emma Kadri-Langford (DDSL) Eleanor Boyce (DDSL) Rebecca Cain (DDSL) Grace Titheridge (DDSL) Daljit Sidhu (DDSL) E: safeguarding.sixthform@windsor-forest.ac.uk T: 01753 443850 Location: Student Services	Windsor College: Daljit Sidhu (DDSL) Sabeeh Mannan (DDSL) Lisa Webber (DDSL) E: safeguarding.sixthform@windsor-forest.ac.uk T: 01753 443850 Location: Student Services Out of hours follow the Out of Hours Procedure.

Out of hours follow the Out of Hours Procedure.	
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Additional External Resources

NSPCC Website <https://www.nspcc.org.uk/>

The Education and Training Foundation has lots of useful curriculum materials and resources, including video and online courses for students and staff on the Prevent Duty. See <http://www.preventforfeandtraining.org.uk/>

Information and support on digital safety

www.thinkuknow.co.uk<https://www.ceop.police.uk/Safety-Centre/>

www.disrespectnobody.co.uk www.internetmatters.org

www.pshe-association.org.uk

educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation <https://swgfl.org.uk/>

Appendix 2

DEFINITIONS OF ABUSE AND HARM

Abuse is 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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children may be abused by an adult or adults or by another child or children.

The Children's Act 1989 and Keeping Children Safe in Education (2024) identifies four main categories of abuse, which are described below.

Physical abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it (see appendix III).

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

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse. In addition to the above, staff should be aware of:

Discriminatory Harm

Guidelines under the Youth, Justice and Criminal Evidence Act 1999, indicate that Colleges need to be aware of discrimination towards people, especially vulnerable or intimidated persons, and its implications. Examples include:

- Racist remarks or racist attack on the person
- Sexist remarks or offensive behaviour
- Offensive remarks related to a person's disability
- Harassment of any kind, including slurs or similar treatment.

Female Genital Mutilation (FGM). Duty to report to the police

Female Genital Mutilation (FGM) is an unacceptable form of abuse and violence against girls and women; it is known as female circumcision and is illegal in the UK. FGM is practised in at least 28 African countries, as well as countries in the Middle East and Asia. Research in the UK has identified three key communities – Somali, Kenyan and Nigerian – where women and girls are particularly vulnerable.

The practice tends to occur in areas of high populations of FGM practising communities. Professionals need to be alert to the possibility of a girl being at risk of FGM or already suffering from the effects of the procedure.

The practice is usually carried out on girls between infancy and 15 years. Guidance states that a member of staff 'in the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the person must report this to the police'. Any member of staff who has concerns or information around a student who may be the victim of FGM, should contact a duty Safeguarding Officer promptly.

Any information around someone suspected of carrying out this practice on others, or failing to protect a child from this procedure, should also be passed to the duty Safeguarding Officer.

Forced marriage

The difference between arranged and forced marriage

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice about whether or not to accept the arrangement remains with the potential spouses. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress can include both physical and emotional pressure.

Possible indicators of forced marriage:

- Absence (especially unusual patterns of this)
- Decline in performance or punctuality
- Low motivation at College
- Poor exam results
- Being withdrawn from College by those with parental responsibility
- Not allowed to attend extracurricular activities.
- Unexpected/sudden departure for lengthy family holiday (student may show reticence to go or be concerned about family members controlling passports and travel documents)

What to do if you are concerned

- Immediately contact the DSL or DDSL
- If you suspect risk of forced marriage and the student wants to talk to you but has not yet disclosed:
 - Make sure you can meet them in a private place where there is a phone.
 - Have a 'story' ready about how you are providing support with learning in case you are challenged by the family.
 - Listen to what the student has to say and write it down.
 - Do not question, apart from to clarify.
 - Inform the student you have to talk to a safeguarding officer and/or senior member of staff but that it will remain confidential.
 - Do NOT raise concerns with the student's parents, family or community leaders.
 - Provide the opportunity for them to talk to the Forced Marriage Unit on: 020 7008 0151

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and

colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to chose: government guidance on forced marriage](#)

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Child criminal exploitation (Including County Lines)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs grooming and exploiting children and vulnerable people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in criminal exploitation are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Different cases may require multi-agency working with different organisations, which the safeguarding team will manage. They may also consider a referral to the National Referral Mechanism. Like other forms of abuse and exploitation, criminal exploitation:

- Can affect any child, male or female, (under the age of 18 years);
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Modern Slavery

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](#)

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.

WFCG are signed up to 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).

Appendix 3

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

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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](#)

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 to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty [Prevent Duty Guidance](#)

The legislation aims to reduce the risk of radicalisation of vulnerable people by extremist groups, including some religious groups, animal rights groups and extreme right-wing groups who may promote terrorism and violent extremist activity.

College staff should be aware of signs of radicalisation and have the confidence to report their concerns to the safeguarding team. If a member of staff has a concern about a person whom they believe has been radicalised, it should be treated with the same seriousness as any other safeguarding issue and the same procedures should be followed.

WFCG also promotes the ethos of the Prevent agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice and its enrichment and induction activities, a belief in equality of opportunity and the celebration of diversity.

WFCG will not host, or allow its premises to be used, by extreme groups and will seek to prevent the distribution of extreme literature via our security teams, staff vigilance and a sign off system of all college displays.

WFCG has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject and takes such steps as are reasonably practicable to ensure, that where political issues are brought to the attention of students, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the College and could constitute misconduct.

Requests for external speakers are dealt with under the External Speakers & Events Policy in line with the Prevent Duty and College Values.

WFCG will provide appropriate support, through its own staff or by referral to external agencies, for any student at risk of radicalisation.

Appendix 4

Safeguarding Referral Form (Strode's and Windsor Colleges)

Student Name			
ID Number		ALS?	
DOB		Age at Referral	
Date of Referral		Gender	
Lead Staff Member			

Key External Contacts		
Agency	Name	Tel / Email
Social Services		
Police		
Parent / Carer		

Summary of Reasons for Referral
INITIAL ACTION

Date		Update By	

UPDATE 1			
Date		Update By	

UPDATE 2			
Date		Update By	

UPDATE 3			
Date		Update By	