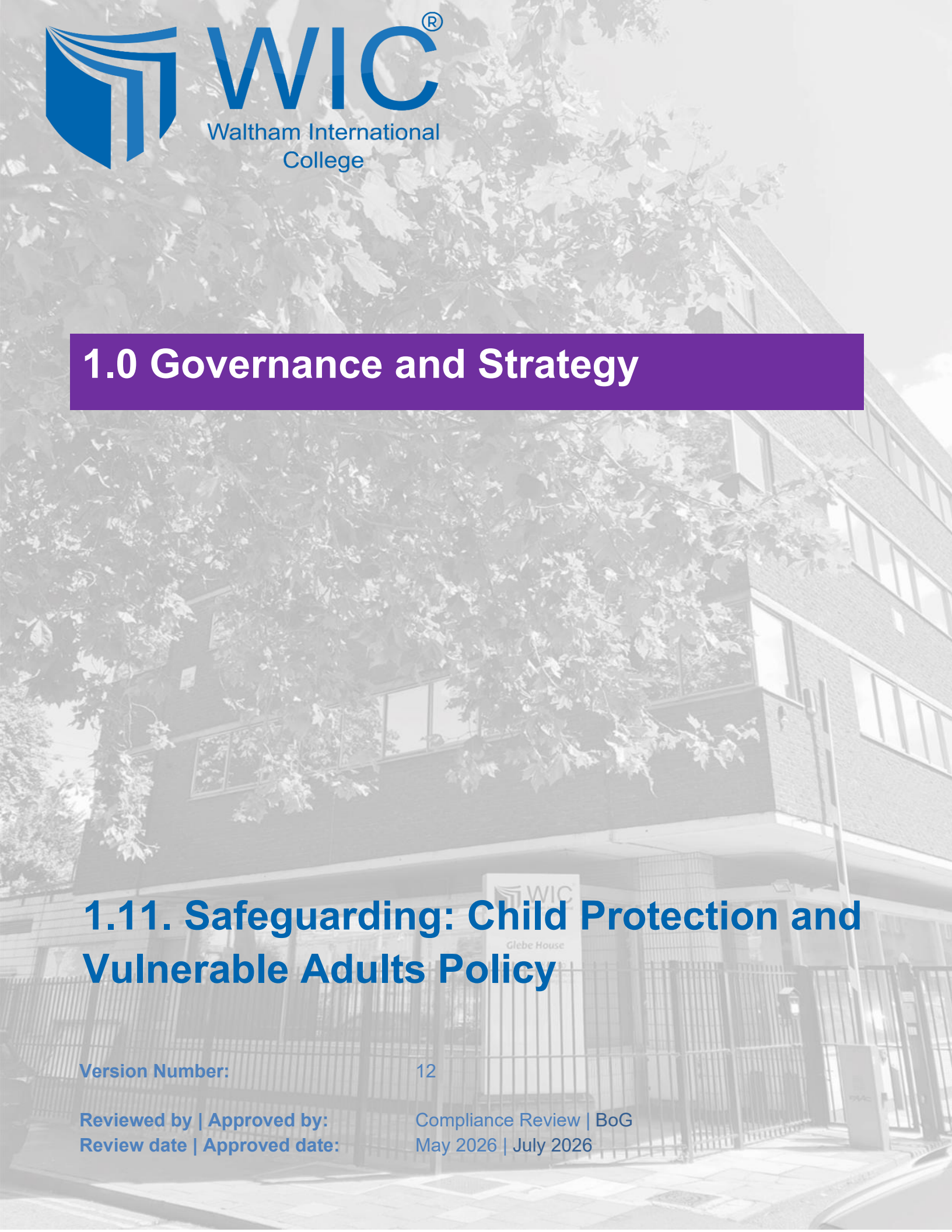
Waltham International College

1.0 Governance and Strategy



1.11. Safeguarding: Child Protection and Vulnerable Adults Policy

Version Number:	12
Reviewed by | Approved by:	Compliance Review | BoG
Review date | Approved date:	May 2026 | July 2026

Compliance Alignment Statement

This version of the Safeguarding: Child Protection and Vulnerable Adults Policy has been aligned to current UK and Office for Students requirements as of May 2026. The substantive changes are listed below.

Version Control Statement

Version	Date	Changes	Reason	Author	Next Review
1	29/10/2015		New Policy	Senior Management	28/10/2016
2	08/03/2017	None	No changes in Law	N/A	07/03/2018
3	13/04/2018	Included Prevent Duty	Adjustments to include links to Prevent	Academic Manager	13/04/2019
4	23/01/2019	Updated to reflect the change in the structure		Herad of HE	July/Aug 2019
5	10/07/2019	Complete revision of policy with additions to procedures, timelines and external reference		Director of Studies	July 2020
6	July 2020	Minor Changes	Annual Review	Head of HE	July/Aug 2021
7	July 2021	Legislative updates included the sexualization of children and vulnerable adults	Annual Review	Safeguarding Lead	Aug 2022
8	Aug 2022	Legislative update, including updates re Welfare officer and peer on peer abuse	Annual Review	Safeguarding Lead	Aug 2023
9	Sep 2023	Legislative update	Annual Review	Safeguarding Lead	Sep 2024
10		Legislative update	Annual Review	Safeguarding Lead	Sep 2025
11		Legislative update AI and e-safety	Annual Review	Safeguarding Lead	Sep 2026
12	May 2026	- Textual revisions made throughout to bring the policy into compliance with applicable regulation - updated to KCSIE 2025; - added OfS Condition E6 (Harassment and Sexual Misconduct); - added Online Safety Act 2023; added Domestic Abuse Act 2021; added Higher Education (Freedom of Speech) Act 2023 obligations; - updated Working Together to Safeguard Children to 2023 edition; - updated Care Act guidance references; - added Birmingham campus referral contacts. - Updated External Reference and Related Policies List - Added appendices 2 -4	Compliance Alignment 2026 (OfS)	QA Compliance Review	August 2027

External Reference Points

- Keeping Children Safe in Education 2025 (KCSIE 2025), DfE
- Working Together to Safeguard Children 2023, DfE/DHSC
- Children Act 1989 and 2004
- Care Act 2014
- Care and Support Statutory Guidance (DHSC, 2023)
- Mental Capacity Act 2005
- Equality Act 2010
- Online Safety Act 2023
- Domestic Abuse Act 2021
- Higher Education (Freedom of Speech) Act 2023
- OfS Condition E6 (Harassment and Sexual Misconduct), August 2025
- Counter-Terrorism and Security Act 2015 (Prevent Duty)

Related Policies and Documents

Affects all other policy documents. This document should however be read together with the following documents:

- 1.12 Prevent Policy
- 1.13 Equality and Diversity Policy
- 2.01 Health and Safety Policy
- 2.04 eSafety Policy
- 2.05 Data Protection and GDPR Policy
- 2.06 Whistleblowing Policy
- 4.05 Complaints Policy
- 4.10 Bullying, Harassment and Sexual Harassment Policy (Students)
- 4.14 Student Conduct of Conduct
- 5.01 Resourcing Policy
- 5.14 Disciplinary and Grievance Policy (Staff)

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1. Purpose

The purpose of this policy is to:

- Set out Waltham International College's (WIC) commitment to safeguarding and promoting the welfare of children, young people, and vulnerable adults who study, work at, or visit the College.
- Provide clear guidance to all staff, governors, volunteers, and contractors on their safeguarding responsibilities.
- Ensure that safeguarding is embedded in all College activities, including curriculum delivery, recruitment, and partnerships.
- Meet the College's statutory obligations under the Children Act 1989 and 2004, the Care Act 2014, Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2023, and all other relevant legislation and guidance.
- Ensure the College complies with OfS conditions of registration, including Condition E6 relating to harassment and sexual misconduct.

2. Scope

This policy applies to:

- All staff employed by WIC, including full-time, part-time, temporary, and agency staff.
- Governors and trustees.
- Volunteers and work placement supervisors working with the College.
- Contractors and third-party providers working on College premises or with College students.
- All students studying at WIC, including those on apprenticeship programmes, higher education programmes, and employer-based learning.
- All College sites, including the main campus in Barking, the Birmingham campus, and any offsite provision or employer premises where College learning takes place.

3. Introduction and WIC’s Commitment

Waltham International College (WIC) is committed to safeguarding and promoting the welfare of all children, young people, and vulnerable adults associated with the College. This commitment is unconditional and applies equally across all campuses, all modes of delivery, and all partnerships.

The College's approach is grounded in the principle set out in Working Together to Safeguard Children 2023: "Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play."

WIC recognises that safeguarding is not solely the responsibility of the Designated Safeguarding Officer or a dedicated pastoral team - it is a whole-College responsibility. All staff are expected to be aware of the indicators of abuse and neglect, to understand how to raise concerns, and to act promptly when a concern arises.

The College maintains a culture of vigilance, openness, and mutual respect. Students and staff should feel safe at WIC, and any individual who raises a safeguarding concern in good faith will be supported and protected.

The Domestic Abuse Act 2021 introduced a statutory definition of domestic abuse that includes economic abuse and coercive and controlling behaviour. Staff should be alert to indicators of domestic abuse affecting students, particularly those in accommodation or facing financial difficulties. Such concerns should be referred to the Designated Safeguarding Officer.

The College's safeguarding arrangements are reviewed annually and whenever significant changes in legislation or statutory guidance occur. This version of the policy reflects all updates required as of May 2026, including the provisions of Keeping Children Safe in Education 2025.

4. Risk Assessment

The College undertakes regular risk assessments in relation to safeguarding to identify, assess, and mitigate risks to students and staff. Risk assessments are conducted:

- At the start of each academic year as part of the annual self-assessment and quality improvement cycle.
- When new provision, partnerships, or off-site activities are established.
- When changes in legislation or statutory guidance require a review of existing arrangements.
- Following any safeguarding incident, near-miss, or external inspection finding.

Risk assessments consider the particular vulnerabilities of the College's student population, including students who are:

- under 18
- care leavers
- have learning difficulties or disabilities
- are experiencing mental health difficulties
- are in precarious housing situations
- are at risk of radicalisation or exploitation

The outcomes of safeguarding risk assessments are reported to the Risk and Compliance Panel and, where appropriate, to the Board of Governors. The Designated Safeguarding Officer maintains a risk register of safeguarding matters.

5. Raising Awareness of Safeguarding Procedures

All members of WIC must recognise the role they play in safeguarding. Safeguarding must be a topic covered within the induction of every member of the College community whether they are students, staff or employers used by the College for work experience purposes.

5.1 Students

All students are informed of the College's safeguarding arrangements at induction. This includes:

- Who the Designated Safeguarding Officer and Deputy Designated Safeguarding Officers are, and how to contact them.
- What safeguarding means and why it matters.

- How to report a concern about themselves or another student.
- What support is available.

Information about safeguarding is displayed prominently on noticeboards in all College buildings, including both the Barking and Birmingham campuses, and is available on the College's VLE and student portal.

5.2 Staff

All staff receive safeguarding training at induction and refresher training at least annually. Staff are provided with:

- A copy of this policy and any associated procedures.
- Clear guidance on how to report a concern, including out-of-hours escalation routes.
- Training on the indicators of abuse, neglect, radicalisation, exploitation, and other safeguarding risks.
- Guidance on safer working practices and professional boundaries.

Staff are reminded of their safeguarding responsibilities through team meetings, CPD sessions, and regular communications from the Designated Safeguarding Officer.

5.3 Employers

Where students are on work placement, apprenticeship programmes, or employer-based learning, the College works with employers to ensure that appropriate safeguarding arrangements are in place. This includes:

- Including safeguarding responsibilities in employer agreements and contracts.
- Providing employers with relevant safeguarding guidance.
- Checking that employers have their own safeguarding and child protection policies where students under 18 are involved.
- Conduction regular contact and monitoring visits o employer sites.

6. Safer Recruitment and Selection

The College is committed to safer recruitment practices and ensures that all individuals appointed to work with children, young people, or vulnerable adults are subject to appropriate pre-employment checks. These include:

- An enhanced Disclosure and Barring Service (DBS) check.
- Verification of identity, qualifications, and right to work in the UK.
- Receipt of a minimum of two satisfactory references, at least one of which is from the most recent employer.
- A face-to-face interview including safeguarding-specific questions.
- Checks against the barred lists where the role involves regulated activity.

The College follows the requirements set out in Keeping Children Safe in Education 2025 in relation to pre-employment checks and maintains a Single Central Record (SCR) of all checks carried out. The SCR is reviewed by the Designated Safeguarding Officer and the Human Resources Manager at least termly.

Temporary and agency staff, contractors, and volunteers working with students are subject to equivalent checks appropriate to the nature of their role. No individual will be permitted to work unsupervised with students until appropriate checks have been completed and satisfactory.

The College's Resourcing Policy (5.01) provides further detail on these requirements.

7. Safer Working Practices

All staff are expected to adhere to the College's Code of Conduct and to maintain appropriate professional boundaries with students at all times. The following principles of safer working practice apply:

- Staff should not be alone with a single student in a closed or unobserved space unless this is unavoidable, in which case the door should be left open or another adult informed.
- Staff should not give personal contact details (including personal mobile numbers, personal email addresses, or social media profiles) to students.
- Physical contact with students should be appropriate, consensual, and necessary.
- Staff should not transport students in their personal vehicles unless there is a genuine emergency and this has been approved by a senior manager.
- Staff should report any situation where they find themselves in a position that could be perceived as compromising to their line manager or the Designated Safeguarding Officer.
- Staff who receive a disclosure of abuse or a safeguarding concern must not promise confidentiality to the student. They must explain, sensitively, that the information may need to be shared with others in order to keep the student safe.

Further guidance on safe working practices is set out in Section 24 of this policy.

8. Healthy Relationships

The College promotes healthy, respectful relationships among students and between students and staff. This includes:

- Embedding awareness of healthy relationships within the PSHE, tutorial, and enrichment curriculum.
- Promoting a culture of mutual respect, consent, and zero tolerance of harassment, bullying, and exploitation.
- Providing information about relationship abuse, including coercive control, and signposting to relevant support services.
- Working with the Student Support team to identify students who may be in unhealthy or abusive relationships and providing appropriate support and referral.

Students are encouraged to speak to a member of staff, the Designated Safeguarding Officer, or the Student Support team if they have concerns about their own safety or the safety of others in relation to relationships.

9. Safe Space

The College is committed to providing a safe, inclusive, and welcoming environment for all students and staff. This includes:

- Ensuring that all College premises are physically safe, well-maintained, and accessible.
- Providing designated quiet spaces and wellbeing areas where students can access support.
- Ensuring that the College's digital spaces - including the VLE, email systems, and online learning platforms - are safe and appropriately monitored.
- Responding promptly and effectively to any behaviour that threatens the safety or wellbeing of any member of the College community.

The College notes its obligations under the Higher Education (Freedom of Speech) Act 2023. Safe space principles must be applied proportionately and in a manner consistent with the College's duties to protect and promote freedom of speech and academic freedom. Where there is apparent tension between safeguarding obligations and freedom of speech duties, the Principal will seek legal advice.

10. Harassment and Sexual Misconduct (OfS Condition E6)

WIC is required to meet OfS Condition E6, which came into force in August 2025. This condition requires the College to have in place requirements relating to incidents of harassment and/or sexual misconduct involving the conduct of staff towards students, and/or the conduct of students towards students.

The College defines harassment as unwanted conduct related to a protected characteristic (under the Equality Act 2010) or unwanted conduct of a sexual nature, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual misconduct includes sexual harassment, sexual assault, and any other conduct of a sexual nature directed at a student without their consent.

WIC's arrangements under E6 include:

- A clear reporting route: students and staff may report incidents of harassment or sexual misconduct to the Designated Safeguarding Officer, who will assess and escalate as appropriate.
- All reports are treated seriously, sensitively and confidentially.
- The College maintains a log of all E6 incidents, reviewed by the Risk and Compliance Panel at each meeting and reported annually to the Board of Governors.
- Staff accused of harassment or sexual misconduct are subject to the College's HR disciplinary procedures and the matter is referred to the Designated Safeguarding Officer.
- The College provides information and signposting to specialist support services for those affected.

- Training on recognising and responding to harassment and sexual misconduct is included in staff induction and annual CPD.

This policy should be read alongside the College's Equality and Diversity Policy (1.13) and Student Bullying, Harassment and Sexual Harassment Policy (4.10).

11. eSafety

The College is committed to ensuring that all students and staff use digital technologies safely and responsibly. The College's e-Safety arrangements include:

- Filtering and monitoring of internet access on College networks.
- Clear acceptable use policies for students and staff.
- E-safety awareness embedded in induction for all students and staff.
- Regular updates to staff on emerging online risks, including cyberbullying, online grooming, sexting, and radicalisation.

The Online Safety Act 2023 places new duties on providers of online services. While its primary obligations fall on platforms and service providers, the College recognises its responsibilities in ensuring that its digital learning platforms, virtual learning environment (VLE), and online communication tools are configured and monitored in line with the Act's principles of safety by design. The College's e-Safety arrangements are updated annually to reflect changes in legislation and guidance, including the Online Safety Act 2023.

Staff and students who become aware of e-safety concerns, including inappropriate online communications involving students, should report these immediately to the Designated Safeguarding Officer. Concerns about online child sexual exploitation or abuse should be reported to the police and, where appropriate, to the National Crime Agency's CEOP Command.

12. Designated Safeguarding Team

The College's Designated Safeguarding Officer (DSO) is responsible for:

- Coordinating all safeguarding activity across the College.
- Receiving and managing all safeguarding referrals and concerns.
- Maintaining secure and confidential records of all safeguarding matters.
- Liaising with external agencies, including children's services, adult social care, the police, and the local authority designated officer (LADO).
- Ensuring that all staff receive appropriate safeguarding training.
- Providing advice and guidance to staff on safeguarding matters.
- Reporting safeguarding matters to the Board of Governors as required.

The College also appoints one or more Deputy Designated Safeguarding Officers (DDSOs), who are trained to the same level as the DSO and can act in their absence.

Current Designated Safeguarding Officer	Surein Rheeder, Principal
Current Deputy Designated Safeguarding Officer(s)	Muhammad Touseef, Head of Birmingham Campus
Designated Safeguarding Leads:	10 Staff – list is available form the Quality Office
Safeguarding Governor:	Professor Paul Ryan

All members of the Designated Safeguarding Team receive training to Level 3 safeguarding (or equivalent) and attend regular CPD to keep their knowledge and skills up to date. The DSO and DDSOs attend LBBD and/or Birmingham multi-agency safeguarding training as appropriate.

13. Referrals

Where a member of staff has a safeguarding concern about a child, young person, or vulnerable adult, they should report this to the Designated Safeguarding Officer immediately. The DSO will assess the concern and determine whether a referral to an external agency is required.

Where there is an immediate risk of harm, staff should contact the police (999) or emergency services without delay and inform the DSO as soon as practicable.

13.1 For Students Based at Barking Campus

- LBBD Children's Social Care: 020 8227 3811 (children's referrals)
- LBBD Adult Social Care: 020 8592 4500 (adults referrals)
- Out of hours: 020 8594 8356
- LADO (allegations against staff): 020 8227 2710

13.2 For Students Based at Birmingham Campus

- Birmingham Children's Trust: 0121 303 1888 (children's referrals)
- Birmingham Adult Social Care: 0121 303 1234 (adults referrals)
- Out of hours: 0121 675 4806
- Email: adultsreferrals@birmingham.gov.uk

All referrals made to external agencies must be documented by the DSO, including the date and time of the referral, the name of the person referred, the nature of the concern, and the response received.

14. Training

The College is committed to ensuring that all staff receive appropriate safeguarding training. The minimum requirements are:

- All staff: safeguarding awareness training at induction and annual refresher training.
- All staff: Prevent awareness training (Prevent e-learning or equivalent).

- Designated Safeguarding Officer and Deputy DSOs: Level 3 safeguarding training, refreshed every two years or as required.
- Governors: safeguarding awareness training relevant to their governance role.

Training records are maintained by the Human Resources Manager and reviewed by the DSO at least annually. Gaps in training are recorded on the College's risk register and addressed as a priority.

Training on recognising and responding to harassment and sexual misconduct (in line with OfS Condition E6) is included in staff induction and annual CPD.

15. Student Support

The College provides a comprehensive range of support services for students who are experiencing safeguarding concerns or other difficulties. These include:

- A dedicated Student Support team with trained counsellors and personal tutors.
- Access to mental health first aid.
- Signposting to external support services, including local authority services, NHS services, and specialist third-sector organisations.
- Financial hardship support for students experiencing economic difficulties.
- Accommodation advice and support.

Students who disclose a safeguarding concern will be supported through the process of referral and any subsequent action. The DSO will ensure that the student is kept informed (where appropriate and safe to do so) of the actions being taken, and that their welfare is monitored throughout.

16. Compliance

The Principal is responsible for ensuring that the College complies with all statutory safeguarding obligations. The Board of Governors has oversight of the College's safeguarding arrangements and receives a termly report from the Designated Safeguarding Officer.

The College's safeguarding arrangements are subject to:

- Annual internal review by the Vice Principal - Compliance and the DSO.
- Review by the Risk and Compliance Panel.
- Periodic external audit or inspection, including by Ofsted and/or the Office for Students.

Non-compliance with this policy by any member of staff may result in disciplinary action, up to and including dismissal. In cases where non-compliance gives rise to a safeguarding risk to a child or vulnerable adult, the matter will be referred to the appropriate external agency.

17. Context and Risk

The College operates in a diverse and complex urban environment and serves a student population that includes many individuals from vulnerable or disadvantaged backgrounds. The College recognises the following contextual risk factors, which may increase the likelihood or impact of safeguarding concerns:

- Students from care-experienced backgrounds or with a history of abuse or neglect.
- Students with mental health difficulties or learning disabilities.
- Students facing financial hardship, insecure housing, or family breakdown.
- Students at risk of radicalisation, gang involvement, or criminal exploitation.
- Students in abusive relationships, including those experiencing domestic abuse or coercive control.
- International students who may be isolated, unfamiliar with UK systems, or at risk of exploitation.
- Students on online or blended learning programmes who have reduced face-to-face contact with staff.

The College takes a contextual safeguarding approach, recognising that safeguarding risks can arise in a range of social contexts beyond the immediate family, including online, in peer groups, and in community settings. Staff are trained to recognise contextual risks and to report concerns accordingly.

18. Written Records

All safeguarding concerns, disclosures, referrals, and actions must be recorded in writing by the member of staff who receives the concern and by the Designated Safeguarding Officer. Records must:

- Be made as soon as possible after the event, and in any case within 24 hours.
- Be factual, accurate, and objective - avoiding opinion or speculation.
- Record the student's exact words where a disclosure has been made.
- Be stored securely, with access restricted to the DSO and those with a need to know.
- Be retained in accordance with the College's data retention policy and the guidance set out in the Information Commissioner's Office (ICO) guidance on data protection.

Safeguarding records are separate from student academic records and are held by the DSO. In the event that a student transfers to another institution, relevant safeguarding information will be transferred securely and in line with data protection legislation.

19. Vulnerable Adults

The Care Act 2014 defines an adult at risk (vulnerable adult) as a person aged 18 or over who:

- Has care and support needs (whether or not the local authority is meeting any of those needs), AND
- Is experiencing, or at risk of, abuse or neglect, AND
- As a result of their care and support needs, is unable to protect themselves from abuse or neglect.

Note: The 'No Secrets' (2000) guidance has been superseded by the Care Act 2014 and its accompanying statutory guidance (Care and Support Statutory Guidance, DHSC, updated 2023), which place adult safeguarding on a statutory footing and establish the duties of local authorities and their partners in relation to safeguarding adults at risk.

The following sub-categories of vulnerability are recognised:

19.1 Mental Health

Adults experiencing mental health conditions, including depression, anxiety, psychosis, and eating disorders, may be at increased risk of abuse or neglect. Staff should be alert to changes in behaviour or presentation that may indicate a mental health concern and should refer to the Student Support team and/or the DSO.

19.2 Learning Disabilities

Adults with learning disabilities may be at increased risk of exploitation, bullying, and abuse. The College ensures that support is in place for students with learning disabilities and that staff are aware of the particular vulnerabilities of this group.

19.3 Physical Disabilities

Adults with physical disabilities may face barriers to accessing support or reporting abuse. The College ensures that its safeguarding arrangements are accessible to all students, including those with physical disabilities.

19.4 Substance Misuse

Adults with substance misuse problems may be at increased risk of exploitation, financial abuse, and neglect. Staff should be alert to signs of substance misuse and refer concerns to the DSO and/or Student Support team.

19.5 Older Adults

Older adults may be at increased risk of certain forms of abuse, including financial abuse, neglect, and isolation. The College's safeguarding arrangements apply equally to all students regardless of age.

19.6 Care Leavers

Care leavers are a particularly vulnerable group and may have experienced previous abuse, trauma, and instability. The College has specific arrangements in place to support care leavers, including a designated personal adviser where applicable.

20. Guidance on Harm/Abuse (Children under 18)

The College recognises the following categories of abuse in relation to children and young people under the age of 18, as defined in Keeping Children Safe in Education 2025:

20.1 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving a child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

20.2 Physical Abuse

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

20.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Activities may involve physical contact, including assault by penetration or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, or encouraging children to behave in sexually inappropriate ways.

20.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter; protect a child from physical and emotional harm or danger; ensure adequate supervision; or ensure access to appropriate medical care or treatment.

20.5 Peer on Peer Abuse

Children can abuse other children. Peer on peer abuse can take many forms, including bullying (including cyberbullying), sexual violence and sexual harassment between peers, physical abuse, and so-called 'upskirting'. The College recognises that peer on peer abuse can occur online as well as in person and that it is most likely to include but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and videos; causing someone to engage in sexual activity without consent; upskirting; and initiation/hazing type violence and rituals.

Staff should never dismiss concerns about peer on peer abuse as 'banter' or 'just part of growing up'. All concerns should be referred to the DSO.

21. Types of Harm to Vulnerable Adults

The College recognises the following categories of harm and abuse in relation to adults at risk, as set out in the Care Act 2014 and Care and Support Statutory Guidance (DHSC, 2023):

21.1 Emotional Abuse

Emotional or psychological abuse includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, or unreasonable and unjustified withdrawal of services or supportive networks.

21.2 Financial Abuse

Financial or material abuse includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance, or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

21.3 Physical Abuse

Physical abuse includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions.

21.4 Sexual Abuse

Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

21.5 Neglect

Neglect and acts of omission include ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care, and support, or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

21.6 Verbal Abuse

Verbal abuse includes the use of language or tone that is degrading, threatening, or humiliating. This may occur in person, by telephone, or online. Staff should be alert to instances of verbal abuse affecting students, whether from other students, family members, employers, or members of the public.

22. Procedure – Reporting Instance of Abuse

Any member of staff who receives a disclosure of abuse, or who witnesses or suspects abuse, should follow the procedure set out below.

22.1 RECEIVE

- Listen carefully and take what the person is saying seriously.
- Do not express shock, disbelief, or judgement.
- Do not ask leading questions or press for more information than is offered.
- Make clear that you are listening and that you take the matter seriously

22.2 REASSURE

- Reassure the person that they have done the right thing by telling you.
- Do not promise confidentiality - explain that you may need to share the information with others in order to keep them safe.
- Reassure the person that they will be supported throughout the process.
- Do not make promises about what will happen next.

22.3 REACT

- Report the concern to the Designated Safeguarding Officer immediately, or to the Deputy DSO if the DSO is unavailable.
- If there is an immediate risk of harm, contact the police (999) or emergency services without delay.
- Do not investigate the concern yourself or discuss it with others except as necessary for the referral process.
- Follow the DSO's guidance on next steps.

22.4 RECORD

- Write a factual, accurate, and objective account of what was said or witnessed as soon as possible after the event.
- Record the student's exact words where a disclosure has been made.
- Do not include speculation, opinion, or interpretation.
- Pass the written record to the DSO and retain a copy in the safeguarding file.

22.5 SUPPORT

- Continue to support the student throughout the process.
- Follow the DSO's guidance on what information (if any) can be shared with the student about the actions being taken.
- Be aware of your own welfare and seek support if needed - safeguarding disclosures can be distressing for staff as well as students.
- Attend any debrief or supervision session arranged by the DSO.

23. Dealing with Allegations Against Staff

Where an allegation is made against a member of staff (including volunteers, contractors, or governors), the following procedure applies:

- The matter must be referred to the Principal immediately. If the allegation is against the Principal, it must be referred to the Chair of Governors.
- The Principal will consult with the Local Authority Designated Officer (LADO) within one working day.
- The member of staff against whom the allegation is made will be informed of the allegation at an appropriate point in the investigation, in line with HR procedures and LADO guidance.
- The member of staff may be suspended on full pay pending investigation, but suspension is not automatic and each case will be considered individually.
- A full record of all actions and decisions must be maintained.
- The College will co-operate fully with any statutory investigation by the police, children's services, or adult social care.

- Where the allegation is upheld, appropriate disciplinary action will be taken, and the matter will be referred to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA) as required.
- Staff who make allegations in good faith will be protected from victimisation.

The College's procedures for dealing with allegations against staff are informed by the guidance in Keeping Children Safe in Education 2025, Part Four.

24. Guidance to Staff on Appropriate Behaviour

All staff are expected to maintain high standards of professional conduct in their relationships with students. The following guidance applies:

- Treat all students with dignity and respect.
- Maintain appropriate professional boundaries at all times.
- Do not engage in personal relationships with students.
- Be aware that some students may develop dependent relationships with staff - if this occurs, seek guidance from the DSO.
- Do not discuss personal matters relating to other students with a student.
- Do not accept gifts from students beyond token gestures of appreciation.
- Be cautious about giving gifts to students - if in doubt, seek guidance from your line manager.
- Ensure that any one-to-one meetings with students take place in an open, observable environment.
- If you are concerned that your behaviour may have been misinterpreted by a student, report this to your line manager or the DSO as soon as possible.

25. General Rules on Electronic Communication

25.1 DO

- Use College email addresses and approved communication platforms to communicate with students.
- Keep records of all electronic communications with students.
- Report any concerns about electronic communications (including inappropriate messages received from or sent to students) to the DSO immediately.
- Use the College's approved VLE and learning platforms for sharing learning materials and providing feedback.

25.2 DO NOT

- Use personal email addresses, personal social media accounts, or personal messaging apps to communicate with students.
- Accept friend or follow requests from students on personal social media platforms.
- Share personal contact details with students.

- Communicate with students outside of normal College hours except in exceptional circumstances and through approved College channels.
- Share images or videos of students without their explicit consent and without following the College's media consent procedures.
- Store images or videos of students on personal devices.

26. Practice That Should Never Occur

The following practices are strictly prohibited at Waltham International College and represent potential grounds for immediate dismissal:

- Physical punishment of any kind.
- Any form of sexual contact with a student.
- Making or participating in sexually suggestive comments about or to a student.
- Entering a changing room or toilet facility used by students.
- Taking photographs or video footage of students for personal use.
- Sharing personal contact details with students.
- Meeting students outside College premises without prior management approval and without another adult present.
- Providing alcohol or illegal substances to students.
- Forming romantic or sexual relationships with students.
- Intimidating, humiliating, or belittling any student.

Any member of staff who witnesses or becomes aware of any of these prohibited practices must report this to the Principal or the Designated Safeguarding Officer immediately. Failure to report such practices may itself constitute a disciplinary offence.

27. Appendices

27.1 Appendix 1: Safeguarding – The Legal Framework

The following legislation and statutory guidance underpins WIC's safeguarding policy and practice:

- Children Act 1989
- Children Act 2004
- Children and Young Persons Act 2008
- Education Act 2002 (Section 175)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 1983 (as amended by the Mental Health Act 2007)
- Counter-Terrorism and Security Act 2015
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR
- Human Rights Act 1998
- Children and Families Act 2014
- Keeping Children Safe in Education 2025, DfE
- Working Together to Safeguard Children 2023, DfE/DHSC
- Care and Support Statutory Guidance, DHSC (updated 2023)
- Online Safety Act 2023
- Domestic Abuse Act 2021
- Higher Education (Freedom of Speech) Act 2023
- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995
- Disability Discrimination Act 2005

Note: The Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995, Disability Discrimination Act 2005, and related regulations listed above have been largely consolidated and superseded by the Equality Act 2010, which is the primary legislation governing discrimination and equal treatment.

27.2 Appendix 2: Individual Learner Risk Assessment Template

This template is used by the Designated Safeguarding Officer (DSO) or their Deputy to record and manage safeguarding concerns relating to individual learners. It should be completed as soon as a concern is identified and updated as the situation develops. All completed templates are stored securely in the confidential safeguarding file and are accessible only to the DSO, Principal, and authorised safeguarding team members.

SECTION A: LEARNER DETAILS

Learner Name	
Date of Birth	
Campus	Barking / Birmingham (circle as appropriate)
Programme / Course	
Mode of Study	On-site / Online / Blended (circle as appropriate)
Date of Concern	
Completed by	

SECTION B: NATURE OF CONCERN

Type of concern	Physical abuse / Emotional abuse / Sexual abuse / Neglect / Domestic abuse / Radicalisation / Prevent / Peer-on-peer abuse / Online harm / Mental health / Other (specify)
Summary of concern	(Record factual observations only. Do not include opinion or speculation.)
Source of concern	Self-disclosure / Observed behaviour / Third party report / Online platform / VLE / Other
Immediate risk of harm?	Yes / No — If yes, emergency services contacted? Yes / No

SECTION C: ONLINE LEARNING ENVIRONMENT RISK FACTORS

Where the learner participates in online or blended learning, consider the following additional risk factors and record relevant observations:

Risk Factor	Present? (Y/N)	Notes / Action
Unexplained or sudden disengagement from online sessions		
Concerning content shared via VLE, chat, or messaging		
Indicators of online grooming or inappropriate contact		
Exposure to radicalising or extremist content online		
Concerns about learner's home or supervised environment during online learning		
Use of personal devices or unsecured platforms for learning		

SECTION D: RISK LEVEL AND ACTIONS

Risk level assessed	Low / Medium / High / Critical
Actions taken	(Detail all actions, including referrals, support provided, and agency contacts made)
External referral made?	Yes / No — If yes, agency name and date:
Review date	
DSO signature	

This record must be stored in the learner's confidential safeguarding file. It must not be filed with general student records. Retention period: six years from the date of the concern, or until the learner's 25th birthday, whichever is the later.

27.3 Appendix 3: Reporting Flowchart

The flowchart below sets out the five-stage process that all staff must follow when a safeguarding concern is received. The stages are sequential: each stage must be completed before moving to the next, except where there is an immediate risk to life, in which case emergency services must be called first (Stage 3) and the remaining stages completed as soon as practicable.

Stage	Action Required	Key Points	Timeframe
RECEIVE	Listen actively to the disclosure or observation. Do not investigate, interrogate, or ask leading questions.	Stay calm. Use open questions ("Can you tell me more?"). Do not promise confidentiality. Do not make promises about outcomes.	Immediately upon receiving the disclosure or concern.
REASSURE	Reassure the individual that they have done the right thing by telling someone and that they will be supported.	Explain that information will only be shared with those who need to know in order to keep them safe. Do not promise to keep secrets.	During and immediately after Stage 1.
REACT	Report the concern to the DSO immediately. If there is immediate risk of harm, call 999 first, then inform the DSO as soon as practicable.	Do not investigate yourself. Do not discuss the concern with other staff or students (except the DSO). Follow the DSO's guidance on next steps.	Within the same working day. If immediate harm is suspected: call 999 without delay. DSO must be informed within 1 hour where possible.
RECORD	Write a factual, objective account of what was said or observed. Record the student's own words where a disclosure was made. Pass the record to the DSO and retain a copy in the safeguarding file.	Include: date, time, location, names of those present, verbatim account (where possible), and actions taken. Do not include opinion, speculation, or interpretation.	As soon as possible after the concern is received, and no later than the end of the working day. DSO to complete formal referral documentation within 24 hours where an external referral is required.
SUPPORT	Continue to support the learner throughout and after the process. Follow DSO guidance on what information can be shared with the learner. Seek support for yourself if needed.	Keep the learner's welfare central. Maintain confidentiality. Debrief sessions are available for staff. Report any change in the learner's circumstances to the DSO promptly.	Ongoing from the point of concern. DSO to review the case at agreed intervals and update the risk assessment accordingly. Case to be formally closed only when the DSO determines that risk has been adequately addressed.

Referral Response Timeframes

The following timeframes apply to referrals made from WIC to external agencies:

Situation	Required Timeframe
Immediate risk to life or safety	Call 999 immediately. No delay is acceptable.
Concern about a child (under 18) — urgent	DSO to contact children's social care within the same working day. Formal referral submitted within 24 hours.
Concern about a vulnerable adult — urgent	DSO to contact adult social care within the same working day. Formal referral submitted within 24 hours.
Allegation against a member of staff	Principal to be informed immediately. LADO to be consulted within one working day (KCSIE 2025, Part Four).
Non-urgent concern (ongoing monitoring)	DSO to assess within 24 hours. Individual Learner Risk Assessment (Appendix 2) to be opened and reviewed at agreed intervals.

All staff must report concerns to the DSO without delay. A member of staff who is unsure whether a concern reaches the threshold for referral should nevertheless report it to the DSO and allow the DSO to make that determination. It is never appropriate for a member of staff to decide alone that a concern does not need to be passed on.

27.4 Appendix 4: Key Contacts

The contacts below should be used by the DSO or Deputy DSO when making referrals or seeking advice. All referrals and agency contacts must be logged in the safeguarding file by the DSO, including the date and time of contact, the name and role of the person spoken to, and the advice or outcome received. Must be displayed in the DSO's office and in the staff safeguarding folder on the College's internal system. Any change to statutory contact numbers must be verified directly with the relevant local authority before updating this appendix.

A. BARKING CAMPUS — LOCAL AUTHORITY AND STATUTORY CONTACTS

Service	Telephone	Notes
LBBD Children's Social Care	020 8227 3811	Children's referrals (under 18)
LBBD Adult Social Care	020 8592 4500	Vulnerable adult referrals
LBBD Emergency Social Work	020 8594 8356	Outside office hours (evenings, weekends, bank holidays)
LBBD Local Authority Designated Officer (LADO)	020 8227 2710	Allegations against staff — Principal must contact LADO within one working day
Metropolitan Police — non-emergency	101	Non-urgent police matters. For emergencies: 999

B. BIRMINGHAM CAMPUS — LOCAL AUTHORITY AND STATUTORY CONTACTS

Service	Telephone	Notes
Birmingham Children's Trust	0121 303 1888	Children's referrals (under 18)
Birmingham Adult Social Care	0121 303 1234	Vulnerable adult referrals. Email: adultsreferrals@birmingham.gov.uk
Birmingham Emergency Social Work	0121 675 4806	Outside office hours (evenings, weekends, bank holidays)
Birmingham City LADO	0121 303 1888	Allegations against staff — via Birmingham Children's Trust duty line
West Midlands Police — non-emergency	101	Non-urgent police matters. For emergencies: 999

C. NATIONAL SPECIALIST CONTACTS

Organisation	Contact	Purpose
NSPCC Helpline	0808 800 5000	Child protection concerns — 24 hours, free
CEOP Command (NCA)	www.ceop.police.uk	Online child sexual exploitation and abuse
Samaritans	116 123	Mental health crisis — 24 hours, free
National Domestic Abuse Helpline (Refuge)	0808 2000 247	Domestic abuse support — 24 hours, free
Prevent Referral — Counter Terrorism Local Profiles	Via local police Prevent team	Referral to Channel programme - concerns about radicalisation
Disclosure and Barring Service (DBS)	03000 200 190	Referrals following substantiated allegations against staff in regulated activity

D. WIC INTERNAL SAFEGUARDING CONTACTS

Role	Name	Contact Details
Designated Safeguarding Officer (DSO)	Surein Rheeder	surein@wic.ac.uk / 020 7018 0430 (ext 401)
Deputy Designated Safeguarding Officer (DDSO)	Muhammad Touseef	touseef@wic.ac.uk / 020 7018 0430 (ext. 602)
Principal	Surein Rheeder	surein@wic.ac.uk / 020 7018 0430 (ext 401) contact for allegations against DSO or staff
Chair of Governors	Professor Paul Ryan	p.ryan@wic.ac.uk contact if allegation is against the Principal