SAFEGUARDING POLICY

SEPTEMBER 2021

1 Introduction

1.1 The College mission 'Collyer's is committed to ensuring every student achieves their potential' is achieved through, for example, 'giving support and guidance in academic and personal development' and 'providing an inclusive culture that values every member of the College and prioritises their wellbeing'. To this end this policy aims to:
- safeguard all College learners, particularly children, young people and vulnerable adults
- safeguard all College staff (including temporary staff, volunteers and partners) in carrying out their duties in teaching, supervising and supporting learners at the College and in their work-based learning.

2 Legal framework

2.1 This policy and its complementary policies and procedures, have been developed to ensure that the College complies with the statutory guidance: 'Keeping Children Safe in Education' September 2021. The policy also takes account of the DfE's 'Working Together to Safeguard Children' (2018), the West Sussex Safeguarding Children Partnership's 'Signs of Safety' and 'West Sussex Continuum of Need/Threshold Guidance'.

2.2 The College recognises that following the independent review of the vetting and barring scheme in 2011, the Protection of Freedoms Act 2012 introduced the Disclosure and Barring Service and will seek at all times to keep up-to-date with developments as well as the updated version of Keeping Children Safe in Education valid from September 2021.

3 Scope

3.1 This policy applies to the protection of all children, young people and adults at risk, studying at Collyer's both daytime and evening, or being provided with College services or activities directly under the supervision or management of College staff and employees of the College.

3.2 The policy does not apply where services or activities are provided separately at the college by another body. However, assurances will be sought from the body concerned that it has appropriate policies and procedures in place with regard to safeguarding children, young people and vulnerable adults.

4 Definitions

4.1 For the purposes of clarity, any person under the age of 18 or if a student, in full-time attendance at College, is deemed to be a child. An adult at risk is deemed to be a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be, unable to take care of him or herself, or unable to protect him or herself against harm or exploitation. An adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional. Any person up to the age of 24 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding and child protection legislation.

4.2 All references to staff or adults, comprises teaching staff, other staff and volunteers working at Collyer's, visitors and also contractors to the organisation with direct contact with learners, regardless of position, role or responsibilities.

4.3 The term 'safeguarding children, young people and adults at risk' embraces both reactive child protection and a preventative approach to keeping children, young people and adults safe.

4.4 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. In

accordance with statutory guidance, the college seeks to protect students from the following safeguarding risks:

- groups and individuals presenting violent extreme ideologies;
- abuse or inappropriate relationships;
- grooming (in person, online, by phone, etc.);
- inappropriate supervision (by parents or staff);
- bullying, cyber-bullying;
- self-harm, risky behaviour;
- mental health risks;
- eating disorders;
- unsafe activities and environments;
- crime;
- fear of crime;
- exploitation including financial, sexual and criminal exploitation (County Lines);
- hazing;
- immigration issues;
- unsafe environments;
- alcohol and drug misuse;
- homelessness and unsuitable housing;
- victimisation and prejudice due to race, sexuality, faith, gender, disability etc.;
- so-called honour-based violence (which can include FGM);
- not understanding the additional safeguarding vulnerabilities of learners with SEN and disabilities, and how those barriers can be overcome;
- peer-on-peer abuse;
- sexual violence and sexual harassment between children;
- upskirting
- issues arising from children with family members in prison;
- domestic abuse;
- issues arising from children being in the Court System;
- children missing from education;
- anything which causes the College to be concerned that any student or member of staff might be at risk of significant harm as a result of one or more of the above.

Further advice and guidance on the range of abuse and indicators of abuse can be found in Part 1, Annex A and Annex B of 'Keeping Children Safe in Education September 2021'. All staff are required to access Part 1 of this document and to read and understand it. Estates staff who work in roles which are not student-facing, will be asked to read Annex A instead of Part 1.

4.5   Abuse can take many forms including emotional, physical, sexual and mental. Whilst it is more common for there to be a perceived disproportionate power differential between abuser(s) and abusee(s), peer on peer abuse is a significant issue. It must never be tolerated or treated as 'banter' or just 'part of growing up.' Peer on peer abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment.

All disclosures will be recorded in the Safeguarding case files and reviewed on a weekly basis by the Safeguarding Team to ensure appropriate support mechanisms are in place for both victims and perpetrators. Whilst peer on peer abuse disproportionately affects females, LGBTQ and SEND students and the College must have appropriate support mechanisms in place, males will also be affected by this issue and staff must be aware of this and be prepared to act accordingly.

5   Aims & Objectives

5.1   Collyer's has a statutory and moral duty to ensure the safety and promote the welfare of children, young people and at risk adults attending the College. The term 'safeguarding' embraces a holistic approach to both child protection and a preventative approach to keeping young people

and adults safe. The College will carry out these responsibilities under relevant current legislation and formal guidance.

5.2   Collyer's has clear objectives:
- To provide a safe environment for children, young people and adults in which to work, learn and take part in social and enrichment activity
- To foster, promote and maintain a genuine feeling of safety throughout the College via the curriculum, pastoral support, and appropriate working practices and through the promotion of a College ethos where everyone feels secure, valued and listened to
- To take action where appropriate to safeguard students through working in partnership with other agencies
- To educate all students and staff in safeguarding and child protection issues so that they become more aware and confident in dealing with issues relating to those matters
- To identify people who are experiencing, or likely to experience significant harm, providing support and taking appropriate action with the objective of producing positive outcomes for those people.

5.3   Collyer's has processes which:
- identify children, young people and adults at risk of significant harm, or where there are concerns for a person's welfare, provide procedures for reporting and addressing such concerns;
- prevent unsuitable people from working with children, young people and adults;
- maintain channels for reporting and dealing with all allegations of abuse;
- work in partnership with local agencies including the sharing of information;
- provide a safe environment for children, young people and adults within the college;
- appropriately filter and monitor student internet and IT usage.

5.4   Collyer's will take action to:
- appoint and train a member of SMT to act as Designated Safeguarding Lead with responsibility for all matters pertaining to safeguarding and child protection, and who will ensure that appropriate and robust systems are in place to coordinate reporting, monitoring, referral and support procedures;
- appoint and train an Operational Designated Safeguarding Lead, to act as the manager of day to day safeguarding issues with a well-trained Safeguarding Team;
- ensure induction training includes coverage of College Safeguarding Procedures and Part One of Keeping Children Safe in Education September 2021 as mandatory for all new staff working in the College;
- train staff in safe practices to protect children, young people and adults in the learning environment, and also to protect themselves from false allegations of abuse;
- train staff to recognise signs of abuse and neglect and to appropriately take a safeguarding disclosure from a student should the need arise, using the Reassure, Record and Refer protocol;
- provide training updates on an annual basis;
- keep accurate and secure records of concerns about individuals, even when there is no need for immediate referral to outside agencies;
- provide a systematic means of monitoring children, young people and adults known, or thought to be, at risk of harm, and contribute to assessments/support plans with other agencies;
- make sources of help and support accessible for anyone who may experience abuse;
- develop effective working relationships with other agencies: Police, Social Services, Early Help, Health Authority and the West Sussex Safeguarding Children Partnership;
- ensure safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), taking of references, and training interviewers in accordance with Department for Education guidance to effectively establish suitability for role at the time of employment;
- provide tutorial and other pastoral support to equip students with the skills to keep them safe and to develop self-esteem, assertiveness, problem-solving skills and resilience.

In taking action, the college will have consideration for the following (5.5 - 5.15):

5.5   **Information Sharing** – The college will ensure that it pursues robust and timely information sharing protocols with all the agencies working with young people including schools, statutory authorities, support services and social services in line with the 'Working Together to Safeguard Children 2018' document. The college will comply with the General Data Protection Regulation in the recording and sharing or personal and sensitive data.

5.6   **Online Safety and E-Safety** – The College will endeavour to both filter and monitor all internet and IT usage within the College in a responsible and transparent way in order to ensure and maintain the safety of staff and students.

5.7   The College recognises that the use of **social media** by young people has grown exponentially and that social media has become of focus for a number of issues including cyber-bullying, sexting, sharing of inappropriate images, the promotion of radical and extreme viewpoints, grooming and CSE. Staff training will aim to develop an awareness of social media safeguarding risks and will include appropriate guidance for dealing with the issues described above.

5.8   **Early Help** means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of 'Working Together to Safeguard Children 2018' provides detailed guidance on the Early Help process. The Safeguarding Team will be responsible for liaising with Early Help Teams to implement Team Around the Family (TAF) support where required.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

5.9   Where any reports are made of **child-on-child sexual violence or sexual harassment** these must be dealt with seriously and quickly. The normal disclosure protocols apply. Where such an allegation is made, the DSL will conduct a thorough risk assessment that considers:
- the victim, especially their protection and support;
- the alleged perpetrator; and
- all other children (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them;

This will be recorded and communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the College on a case by case basis.

5.10   The College will seek to minimise instances of **peer on peer harassment and abuse** by ensuring that:

- Staff receive training to recognise the indicators of peer on peer harassment and abuse across its spectrum, including its gendered nature, and know how to refer cases and support students.
- Provide a Safeguarding Team that works directly with staff and students in a pro-active manner to inform awareness of peer on peer harassment and abuse and provide guidance and support on how to manage and address it, including the consistent challenge and management of so-called 'banter'.
- The Safeguarding Team will work closely with curriculum staff, students and parent/carers to ensure that both victims and perpetrators have access to support and guidance mechanisms.
- All cases of peer on peer harassment and abuse will be recorded and managed through the existing referral and case management procedure.

Peer on peer abuse can take a range of different forms including, but not limited to:
- sexual violence and sexual harassment. Part 5 of the KCSiE guidance sets out how colleges should respond to reports of sexual violence and sexual harassment;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- initiation/hazing type violence and rituals;
- sexting (also known as youth produced sexual imagery) or sharing of nudes. This will be treated sensitively by the College and where disclosed or discovered the participants will be supported and guided appropriately. In the case of malicious intent being shown the Police will be informed and the College's Disciplinary Procedure invoked.

5.11 **Prevent Strategy –** To ensure that the College effectively safeguards students and staff, manages risks and is able to deal appropriately with issues around radicalisation and extremism, the College will;
- understand the nature of the threat from extremism and how this may impact directly or indirectly on the College;
- encourage staff and students to respect and adhere to fundamental British Values;
- ensure staff receive awareness training in recognising and preventing extremism and radicalisation;
- understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of College premises;
- respond rapidly and appropriately to events in local, national or international news that may impact on the College community;
- ensure measures are in place to minimise the potential for acts of extremism within the College;
- ensure plans are in place to respond appropriately to a threat or incident within the College;
- work with sub-contractors, employers and work placement providers to ensure they are compliant with the Prevent Duty and the College's safeguarding procedures;
- adopt effective ICT security and responsible user policies and promote these to all staff and students.

5.12 **Lanyard ID –** In order to ensure that anyone accessing the College campus is provided with a safe environment, it is a requirement that all staff and students wear Lanyard ID. Visitors and contractors will be issued with a badge at reception to identify them as an official visitor to the College. Collyer's Security Officers will challenge any person on site not wearing Lanyard ID or a visitors badge.
- No College services (e.g. Library, Refectory, Finance Office, Student Services etc.) will be provided to any person not **wearing** their Lanyard ID.
- All teaching staff are required to check students' Lanyard ID are worn at the start and at the end of all teaching sessions. All staff should challenge lack of Lanyard ID around campus.
- Lost Lanyard ID must be replaced immediately at the student's expense.
- Any student who has forgotten their ID badge must collect a temporary wristband from the Library. The date of issue for each temporary wristband will be recorded against student records by the issuing member of staff. Warnings are issued to students and parents by

Tutor and Head of House for repeated wristband issues and students must attend Safeguarding Training if a student records five wristbands in any one term. Further non-compliance may result in exclusion from campus.

5.13   **Contextual Safeguarding & Local Circumstances** – Collyer's believes all students have the right to access and enjoy a high quality and rich learning experience that both enhances and increases their life chances. The College serves the needs of students from a range of backgrounds and a wide demographic area. Horsham, Crawley and coastal towns such as Worthing face ongoing challenges with 'County Lines' issues. The College will regularly consult with local agencies including the area Prevent Advisor, to ensure that all staff have an effective understanding of the local context and all safeguarding training will acknowledge and reference the local context, to ensure that staff are adequately prepared to manage such issues that arise from this.

5.14   **LAC and previously LAC –** The College will work in close collaboration with Children's Social Services to ensure all Looked After Children and previously LAC are identified and offered appropriate support mechanisms.

5.15   **Children Missing From Education** – Where students under the age of 18 are displaying erratic, long-term or regular absences, or other unusual attendance patterns, the College will ensure that staff follow up with parent/carers to ensure a full understanding of the underlying absence reason is gained and recorded where appropriate. In cases where a safeguarding concern is known or suspected the Safeguarding Team will make a MASH referral and/or contact Early Help. All such cases will be recorded and monitored using the existing referral and case management procedures.

6   Responsibilities

6.1   The College recognises that safeguarding and child protection are integral to many College policies and procedures. This overarching strategy should therefore be considered most particularly in conjunction with those covering the safe recruitment of staff and health and safety. These are produced in consultation with staff, students and the relevant agencies as appropriate and reviewed on an annual basis. Further policies of relevance to safeguarding and child protection including, for example the Staff and Student Codes of Conduct, Bullying and Harassment Policy and Social Media Policy are listed at the end of this policy and will also be reviewed on a regular basis and no less than every three years.

6.2   **Duty of Care** – Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children, young people and vulnerable adults from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of the College. Staff behaviour should demonstrate integrity, maturity and good judgement, e.g. management of risk in external visits/residential visits.

6.3   **Breach of Trust** – Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the child.

Staff have a legal and moral responsibility for the students in their care. Instigating, or allowing to develop, any form of sexual or potentially sexual relationship with a student (of any age) at the college, is considered to be a breach of trust. Any physical punishment or gratuitous physical contact is also against college policy and likely to be a criminal offence.

6.4   **Use of Reasonable Force by staff –** There are circumstances when it is appropriate for staff to use reasonable force to safeguard students. The term 'reasonable force' covers the broad

range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. The College has adopted the Department for Education's guidance on the use of reasonable force in schools which is made available to all members of staff on Sharepoint.

6.5 **All staff** play a fundamental role in ensuring children, young people and adults are kept safe at the College through vigilance, attending training, reporting concerns and acting swiftly where there is a risk of immediate danger or harm.
- Concerns are any worries about a particular student or colleague that need to be referred on to the Safeguarding Team, wherever there is a lack of surety or clarity about someone's safety.
- Risk of immediate danger or harm means a situation where action must be taken without delay in order to ensure adequate protection is put in place for the person at the centre of the issue. Staff are able to refer direct to Social Services or the Police in these circumstances should the need arise but where possible the Safeguarding Team should be manage referrals.

6.6 **The Governing Body** is responsible for ensuring that the College has effective policies and procedures in place, and for monitoring the college's compliance with them. The Governing Body does not have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff).

Link governors with responsibility for child protection and safeguarding shall receive appropriate training to assist them in fulfilling their duties which are to:
- ensure safeguarding policies are reviewed on an annual basis and an annual report received by governors;
- consider and make recommendations on the safeguarding implications of new and revised policies;
- monitor the effectiveness and efficiency with which the safeguarding function is carried out, ensuring that processes are both robust and free from undue bureaucracy.

The lead governor on safeguarding may also be a link in the liaison with the agencies in connection with allegations against the Principal. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and the provision of information to assist enquiries.

6.7 **The Principal** has responsibility for:
- ensuring that sufficient resources are allocated for training;
- policies and procedures are fully implemented and followed by all staff;
- ensuring the operation of safe recruitment and checks on new staff and volunteers;
- the reporting of cases to the Secretary of State. It is essential that cases are reported if a person ceases to work in an education setting and there are grounds for believing he/she may be unsuitable to work with children, or may have committed misconduct. The Secretary of State will consider whether to prohibit the person from working with children in the future or place restrictions on their employment in educational establishments.

6.8 **The Designated Safeguarding Lead (DSL)** with responsibility for safeguarding issues is the Vice Principal (Pastoral), Andrea John. The post holder, supported by the **Operational Designated Safeguarding Lead** and **Safeguarding Team**, are responsible for:
- taking lead responsibility in all safeguarding matters
- acting as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies
- liaising with Principal and Link Governors to inform of any issues/ongoing investigations, and ensure there is always cover for the role

- acting as the Principal's delegate in the referral of cases of suspected abuse or allegations to the Local Authority Designated Officer (LADO), the Multi Agency Safeguarding Hub (MASH), Adult Services and other investigating agencies such as the police
- ensuring all safeguarding team members have access to appropriate supervision as required
- ensuring all staff have child protection/Safeguarding induction training and are able to recognise and report any concerns as they arise
- keeping detailed, accurate and secure written records of referrals/concern
- ensuring Safeguarding policy is updated and reviewed annually
- ensuring students/parents/carers have access to copies of the College Safeguarding Guidance, which alerts them to the fact that referrals may be made, contact details for the Safeguarding Team, and the role of the establishment
- raising awareness of issues relating to the welfare of children and young people with staff and students, and the promotion of a safe environment for those learning within the College
- ensuring appropriate links to other relevant groups including the Equality & Diversity (E&D) Group, the Pastoral Committee and the Support Staff Managers Group, in order to ensure there are effective policies, procedures and systems in place which meet the needs of both staff and students in safeguarding and promoting the welfare of all young people and vulnerable adults
- ensuring that the DSL, Operational DSL and Safeguarding Team have received training in child protection issues and inter-agency working, as required by the West Sussex Safeguarding Children Partnership which is updated at least every two years
- assessing the development needs of staff and governors in relation to safeguarding and co-ordinating appropriate training which is updated at least every three years
- monitoring and reporting on the effectiveness of the safeguarding policies and procedures within the college to SMT and the Governing Body through the Quality & Standards Committee
- liaising with secondary schools to ensure information on vulnerable students is shared effectively and appropriately
- liaising with new establishments when students with child protection issues leave the college before the age of 18 or as a vulnerable adult
- ensuring that curriculum areas liaise effectively with employers and training organisations who receive young people from the College (including on work placements) to confirm appropriate safeguards are in place

6.9 The **Operational DSL** Helen Mayer-Dean (Director of Student Support) and the **Safeguarding** Team take responsibility for day to day operational management of safeguarding issues under the direction of the DSL. The Operational DSL has particular responsibility for management of Child Protection issues.

7   Student Support

7.1   All students will be made aware of the range of College policies relevant to their welfare as part of their induction to the College (to include the Code of Conduct, Equality & Diversity Duty, GDPR Privacy Notice, Harassment and Bullying Policy, Social Media Policy and Health and Safety provisions) as well as the personal support available through their Tutors, Heads of House, Student Services and the Counselling Service. They shall also receive support in promoting their own wellbeing and that of others through the Enrichment programme. These opportunities and further forms of support will be further communicated through the VLE, enrolment handbooks, the website and College prospectus as appropriate.

7.2   Furthermore the College will ensure that students are consulted effectively about the safeguarding provisions within the College through a number of means:
- the Pastoral Committee whose membership will include safeguarding and tutorial officers of the Richard Collyer Union at a minimum of 2 meetings through the year;
- the Tutorial Programme and the Richard Collyer Union;
- student governor involvement on the Quality & Curriculum (Q&C) Committee and Governing Body.

8   Outside agencies/stakeholders

8.1   The College recognises that in carrying out its statutory and moral obligations to safeguard the young people and vulnerable adults within the College it is essential to work effectively with a number of partners including the West Sussex Safeguarding Children Partnership, Social Services, the police, NHS West Sussex, CAMHS, the Multi Agency Safeguarding Hub, Integrated Prevention Earliest Help (IPEH) teams, local employers and partner and external feeder schools. In so doing it will act in a discreet and appropriate manner in sharing any personal information on young people and vulnerable adults in order to safeguard their welfare.

9   Monitoring and reviewing policy and procedures

9.1   The DSL will ensure that the safeguarding and child protection policy is reviewed on an annual basis. The DSL will also provide an annual report to the Quality & Curriculum Committee outlining significant safeguarding incidences and any child protection allegations (with no reference to individuals) that have occurred during the year and how they were addressed. The Governing Body will pursue any key issues arising from the report when it considers the minutes and report of the Q&C Committee where the report was considered.

9.2   Further monitoring will be undertaken through the Strategic Plan, College Risk Assessment, SAR and QIP. The DSL will ensure any significant in-year problems are brought to the attention of the Governing Body, including reporting at the earliest opportunity any deficiencies in policies or procedures. The DSL will report on a half-termly basis to SMT on safeguarding issues or more frequently as required.

10   Public Interest disclosure

10.1   Staff should acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies (Public Interest Disclosure Act 1998). This Whistleblowing Policy provides a mechanism by which staff can voice concerns, made in good faith, without fear of repercussion. Staff can also use the NSPCC whistle-blowing helpline number 0800 028 0285, if required.

11   Staff Training

11.1   All staff will receive training to familiarise themselves with Safeguarding issues and responsibilities at induction to include; college referral process for safeguarding issues, 'Part One of KCSiE' and the Home Office Prevent e-Learning Package. On at least an annual basis, all staff with a role in directly working with under 18s will receive updates on safeguarding issues through staff development events and/or staff meetings. Prevent Training will be updated at least every 3 years for all staff.

11.2   The Designated Safeguarding Lead, Operational Designated Safeguarding Lead and Safeguarding Team will complete WSCC DSL Training with biannual updates. The Safeguarding Team will also undertake relevant multi-agency and specialist safeguarding training where possible.

11.3   Heads of House, Student Services and the Safeguarding Team who work with students closely in a pastoral capacity, will receive yearly enhanced Safeguarding Training, to support their understanding of current safeguarding issues, practice and policy and protect them in their roles.

11.4   All training delivered in house will be made available on SharePoint for staff to access independently for reference or in follow-up where training has been missed. Staff will be required to confirm they have completed scheduled safeguarding training within their annual appraisal.

11.5   The Staff Development Team will ensure all staff receive safeguarding training as part of their induction. Training will be completed within 3 months of appointment.

12   Related Policies & Procedures

Policies to be considered in conjunction with the overarching Safeguarding & Child Protection Policy:

- Recruitment Policy Health and Safety Policy
- Fire Safety Policy
- Complaints Policy
- Curriculum Policy
- Data Protection Policy incl CCTV and Use of IT
- Equality & Diversity Duty and Schemes
- GDPR Privacy Notice
- Hospitality and Gifts Policy
- Risk Management Policy
- Sickness Management Policy
- Social Media Policy
- Staff Bullying and Harassment Policy and Procedures
- Staff Capability Policy
- Staff Code of Conduct
- Staff Disciplinary Policy
- Staff Grievance Policy and Procedures
- Stress Management Policy
- Student Bullying and Harassment Policy
- Student Code of Conduct
- Student Disciplinary Policy and Procedures
- Support for Students Statement (Disability Statement)
- Use of Computers Agreement
- Whistleblowing Policy
- Work Experience/Trips and Visits Procedures

APPENDIX 1

Safeguarding & Child Protection Procedures:

Designated Safeguarding Lead (DSL):
Andrea John – Vice Principal (Pastoral). Room: A214 - Telephone Ext. 502

Operational Designated Safeguarding Lead (DDSL):
Helen Mayer-Dean (Director of Student Support). Room: B104 - Telephone Ext. 704

Safeguarding Team (DSL Trained):
Helen Bolger (Head of Student Wellbeing) Room: B008 – Telephone Ext. 723
Nicola Algar (Student Services Manager) Room: B002 - Telephone Ext. 702
Tamsin Trent (Student Services Officer) Room: B002 – Telephone Ext. 742

Link Governor: **Dr Grant Powell**
                         c/o Nicola Whitehead, Clerk to the Governing Body.

                         Room B208 - Telephone Ext. 519

Procedure for dealing with disclosure – REASSURE, RECORD, REFER
If a child, young person or vulnerable adult tells a member of staff about possible abuse:

DO:
- Stay calm and reassuring
- Listen to and take what the student says seriously
- Tell the student that she/he is right to tell someone
- Let him/her know that you understand how difficult it is to talk about such experiences
- Arrange a place and time where you can talk privately and uninterrupted as soon as possible
- Explain that you will need to involve other people and why
- Be supportive
- Give realistic encouragement
- Allow student to speak
- Let the student know that she/he is not to blame
- Make written record of what is said by the student – unprompted and in their own words
- Refer the concern to the Safeguarding Team
- Talk to someone about your feelings and seek support for yourself

DO NOT:
- Promise confidentiality (to keep a 'secret')
- Make promises or reassurances you cannot keep
- Press for details or ask leading questions which may invalidate court proceedings
- Ask the student to repeat the details unnecessarily
- React emotionally e.g. showing anger, disgust or disbelief
- Trivialise or exaggerate the issue
- View or share evidence of youth produced sexual imagery
- Interrupt or stop a student during a disclosure
- Underestimate your role as a trusted adult
- Forget to make time and seek support for yourself

Staff should not investigate concerns or allegations themselves, but should report them immediately to the DSL or Operational DSL.

Confidentiality
Any young person or vulnerable adult who wishes to disclose must be informed that the member of staff has a professional responsibility to share the relevant information about the protection of the child with other professionals.

If a young person or vulnerable adult confides in a member of staff and asks for the information to be kept secret they must be informed that the member of staff has a responsibility to share the information with someone who can help. This needs to be done with care and sensitivity and the young person or vulnerable adult needs to be reassured that the matter will only be discussed with people who need to know.

Safeguarding Team - Recording & Case Management Procedure:
1. All safeguarding concerns are either identified by, or referred through to, the Safeguarding Team by members of staff, external agencies, students (either self-referring or bringing concerns about peers) or parent/carers
2. The Safeguarding Team will investigate all concerns and allegations, make an assessment of risk, conduct safety planning where needed and make a judgement on next steps in consultation with other DSLs as needed, before referring on to appropriate agencies.
3. The Safeguarding Team will meet with the Operational DSL on a weekly basis to review all new cases of students at risk, to monitor on-going cases, and to review and monitor a watch-list of those cases where there are concerns or known pertinent information but that have not yet met an intervention threshold
4. Student case logs and the 'Students At Risk' list are recorded on CPOMS with summary information on MyProgress where needed for communication with other staff who work with the student.

ANNEX A

DEFINITIONS

Physical Injury: Actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Factitious Illness by Proxy (Munchausen Syndrome by Proxy) may also constitute physical abuse.

Neglect: The persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

Emotional Abuse: The persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effect on the child's emotional development. It may involve conveying to the child that s/he is worthless or unloved, inadequate, or valued only insofar as s/he meets the needs of another person. It may involve causing a child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Sexual Abuse: Actual or likely sexual abuse/exploitation of a child or adolescent. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities such as involving children looking at pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate way.

Forced Marriage: A forced marriage is a marriage conducted without the full consent of both parties and where duress (emotional pressure in addition to physical abuse) is a factor. It is an entirely separate issue from an arranged marriage and the two should not be confused. It is illegal in the UK, and since 2004 can come under the Government's definition of domestic violence and abuse.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?
It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/ colleges/colleges take action **without delay** and call the LADO or Social Services.

Forced Marriage Unit – Telephone 020 7008 0151 Email: fmu@fco.gov.uk

ANNEX B

PREVENT Strategy

The PREVENT strategy was revised in 2011 and has the following three objectives:

1)   Challenging terrorist ideology by working closely with other local and national agencies and partners, including working with communities.

2)   Supporting vulnerable individuals through intervention projects.

3)   Work closely with institutions where risks may occur such as education, prison and health.

The Counter Terrorism and Security Act 2015 places a duty on education establishments to have a due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty of Guidance for England and Wales July 2015 gives more specific guidance for Further Education establishments. The college is working with police and local training providers to fulfil our duty which includes processes and procedures within the college and to provide awareness training for both staff and students. The college promotes British Values summarised in Collyer's Values and maintains a PREVENT Duty Risk Assessment and Action Plan updated alongside the SAR & QIP process.

Annex to Safeguarding and Child Protection Policy

COVID-19 changes to procedure during lockdown (Distance Learning)

Response to COVID-19

There have been significant changes within our setting in response to the outbreak of Covid-19. Teaching and learning will occur remotely, possibly for significant periods of time, and staffing is likely to be impacted by illness and caring responsibilities.

Despite changes, the college's safeguarding aims and objectives are fundamentally the same:

- To provide a safe environment for children, young people and adults in which to work, learn and take part in social and enrichment activity;
- To foster, promote and maintain a genuine feeling of safety throughout the college via the curriculum, pastoral support, appropriate working practices and through the promotion of a college ethos where everyone feels secure, valued and listened to;
- To take action where appropriate to safeguard students through working in partnership with other agencies;
- To educate all students and staff in safeguarding and child protection issues so that they become more aware and confident in dealing with issues relating to those matters;
- To identify people who are experiencing, or likely to experience significant harm, providing support and taking appropriate action with the objective of producing positive outcomes for those people.

Whilst Collyer's Safeguarding and Child Protection Policy continues to apply to all that we do, this annex sets out some of the adjustments to procedures necessary as we respond to safeguarding advice from government and local agencies.

College Closure

During college closure:

- Subject teachers provide online teaching and learning to all learners
- Director of Student Support assesses risks of home learning for all students with an EHCP and contacts learner/home to ensure students are happy and supported working from home
- Vulnerable learners have a named contact for concerns or queries and they are also able to report any issues via the safeguarding email safe@collyers.ac.uk
- Study support team provide remote 1-1 learning support for those who usually have access to specialist support, including learners with an EHCP
- Safeguarding Team and Heads of House remain in regular contact by email/phone with 'at risk'/vulnerable learners
- Safeguarding Team are in contact with external agencies involved in supporting our students
- Dialogue continue to provide college counselling service by telephone and/or online app
- Finance continue to make bursary payments directly into student bank accounts and students who usually access Free School Meals are also provided £15 per week into their bank accounts
- Regular updates are posted on our website: https://www.collyers.ac.uk/coronavirus/

Reporting arrangements

Reporting arrangements continue in accordance with our safeguarding and child protection policy. The college's approach ensures the DSL or a deputy is always on site whilst the college is open. In

the unusual circumstance this is not possible the DSL or a Deputy DSL will be contactable by phone and a member of SMT will provide onsite support.

Designated Safeguarding Lead: **Andrea John asj@collyers.ac.uk (emergencies 07958027968)**

Operational DSL: **Helen Mayer-Dean hmd@collyers.ac.uk**

Staff will continue to follow the Safeguarding and Child Protection policy and procedures and advise the safeguarding team immediately about concerns they have about any student, whether in college or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child or young person is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority. The arrangements for contacting children's services are available here: https://www.westsussexscp.org.uk/2016/04/multi-agency-safeguarding-hub-mash/

Should a child or young person in the college's view be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure, available here: https://www.westsussexscp.org.uk/professionals/concerns-at-work-2/resolving-professional-differences/

Arrangements for safeguarding referrals in the event of college closure are as follows:

Safeguarding Concerns (when you are worried that a student is at risk of harm)

- If a safeguarding concern arises from your interactions online or by phone with students, in the first instance encourage the student to talk to their parent/carer
- Refer **non-urgent concerns** to the college safeguarding email safe@collyers.ac.uk – this will be checked daily by a member of the safeguarding team
- **If the concern is urgent**, you should call the student's parent (unless this would put the student at greater risk)
- **If your concern is urgent and you are unable to speak to the student's parent/carer** please contact Andrea John (07958027968)
- **In an emergency** call 999

Holiday arrangements
The safeguarding team will continue to make contact with at risk learners and also continue to check the safeguarding email inbox.

Attendance
When partially open, the college is following the attendance guidance issued by government. Where a student is expected and does not arrive the college will make contact with the student and/or family. If contact is not possible, the DSL will inform appropriate external agencies.

Staff will be aware of increased risk
The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work for students to undertake at home (including recognising the impact of online learning – see below). Staff will be aware of the mental health of both students and their parents and carers, informing the DSL about any concerns. The college tutorial programme will include self-help information to support students through the challenges of working from home and social distancing. The Wellbeing VLE also

contains a range of reading resources and online modules to support good mental health and positive wellbeing.

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. We also address the issue of peer-on-peer abuse in our tutorial curriculum.

Risk online

Young people will be using the internet more during this period. The college may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same student-centred safeguarding practices as when students were learning at college.

- The college continues to ensure that as far as possible, appropriate filters and monitors are in place
- Our governing body will review arrangements to ensure they remain appropriate
- The college has taken on board guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. We have reviewed the code of conduct and information sharing policy accordingly
- Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the college's code of conduct and importance of using college systems to communicate with children and their families.
- Staff have read Online Learning - Safeguarding Considerations prior to delivering any livestreamed sessions
- Young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the college
- Safeguarding Team are able to direct student to Childline, the UK Safer Internet Centre and CEOP if they have concerns online
- Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

Allegations or concerns about staff

With such different arrangements young people could be at greater risk of abuse from staff or volunteers working with external services. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

We have confirmed the arrangements to contact the LADO at the local authority remain unchanged: https://www.westsussexscp.org.uk/professionals/concerns-at-work-2/lado-local-authority-designated-officer/

If necessary, the college will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult, and to the Teacher Regulation Agency in line with paragraph 166 of Keeping Children Safe in Education 2019 using the address Misconduct.Teacher@education.gov.uk.

This policy annex has been remotely approved by Governors and is available on the college website