



COLLYER'S
Founded in 1532

SAFEGUARDING AND CHILD PROTECTION POLICY

September 2022

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1 Introduction

1.1 Safeguarding and Child Protection Statement

Collyer's takes its responsibility to safeguard young people extremely seriously and the college will train and empower **all staff** to recognise and respond effectively to protect a young person who may be at risk of significant harm.

'It could happen here'

We will ensure that all staff members at Collyer's maintain an attitude of 'it could happen here' and feel able to raise concerns either about a young person at risk or a member of staff whose behaviour may present a risk to a student.

1.2 Safeguarding and promoting the welfare of young people is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff at the college including temporary staff, volunteers and Governors, should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the young person.

1.3 The purpose of this policy is to inform staff, students, parents/carer, volunteers and Governors about the college's responsibilities for safeguarding children and young people, and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

1.4 At Collyer's, we will:

- i. have safeguarding at the heart of everything we do.
- ii. maximise opportunities to hear the voice of all our young people and do all we can to understand their lived experience.
- iii. maximise opportunities to teach students how to keep safe both in the real and virtual world.
- iv. support students' development in ways that will foster security, confidence and independence and provide an environment in which young people feel safe, secure, valued, respected and confident.
- v. recognise where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, that this can have a lasting impact on mental health, behaviour, and education throughout adolescence and into adulthood.
- vi. ensure that ALL our young people know a member of staff they can communicate with if they are worried about something.
- vii. ensure the wishes and feelings of our young people are taken into account when determining what action to take and what services to provide in response to a safeguarding concern. Systems will be put in place for students to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the young person at heart.
- viii. make sure all our staff, including volunteers know how to contact child protection agencies should they need to.
- ix. provide a systematic means of monitoring young people known or thought to be at risk of harm and ensure that the college contributes to assessments of need and support packages for those children.
- x. emphasise the need for good levels of communication between all members of staff and between the college and other agencies.
- xi. have and regularly review, a structured procedure within the college which will be followed by all members of the community in cases of suspected abuse.
- xii. develop and promote effective working relationships with other agencies, especially the Police and Children's Social Care, including Early Help.
- xiii. ensure that all adults, including supply staff, contractors and volunteers, within our college who have access to children have been recruited and checked as to their suitability in accordance with Part 3 of Keeping Children Safe in Education (KCSiE) 2022.

- xiv. have in place, other, up to date policies and procedures which support safeguarding (see point 12 and attached appendices).
- xv. make sure all staff are aware of the systems within college which support safeguarding. We will explain this on induction by sharing details of this policy, safeguarding referral procedures, student and staff codes of conduct, behaviour related policies, and the role of the Safeguarding Team.
- xvi. in respect of peer-on-peer abuse or any other safeguarding situation, reassure young people who report concerns, that they will be taken seriously and kept safe. We will never give a young person the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment nor should a young person ever be made to feel ashamed for making a report.

1.5 Working Together to Safeguard Children 2018

Collyer's recognises the findings in Working Together to Safeguard Children 2018, where children expressed that they wanted an effective safeguarding system to be:

- vigilant: to have adults notice when things are troubling them
- understanding and actioned: to understand what is happening; to be heard and understood; and to have that understanding acted upon
- stable: to be able to develop an ongoing stable relationship of trust with those helping them
- respectful: to be treated with the expectation that they are competent rather than not
- informed and engaged: to be informed about and involved in procedures, decisions, concerns and plans
- explained: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- supported: to be provided with support in their own right as well as a member of their family
- advocated: to be provided with advocacy to assist them in putting forward their views
- protective: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

We will use this information to support the training of our staff and review this and other policies as appropriate.

2 Legislative framework

2.1 Safeguarding children and child protection applies to all children up to the age of 18. We recognise that Keeping Children Safe in Education 2022 applies to Post-16 Education as set out in [Education & Training \(Welfare of Children\) Act 2021](#).

2.2 Collyer's will act in accordance with the following government legislation and guidance:

- The Children Act 1989 <https://www.legislation.gov.uk/ukpga/1989/41/contents>
- The Children Act 2004 <https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Education Act 2002 <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education/about-this-guidance>
- Keeping Children Safe in Education (DfE September 2022) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Teaching online safety in school (DfE June 2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf
- Working Together to Safeguard Children 2018: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

- Regulated Activity in relation to children: scope
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf
- The Education (Child Information) (England) Regulations 2005
<https://www.legislation.gov.uk/ukxi/2005/1437/contents>
- Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf
- Dealing with Allegations of Abuse against Teachers and Other Staff (2012)
<https://www.gov.uk/government/publications/allegations-of-abuse-against-teachers-and-non-teaching-staff>
- Children Missing Education
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf
- West Sussex Safeguarding Children Partnership and Pan-Sussex safeguarding procedures
[West Sussex Safeguarding Children Partnership](#)

3 Scope

3.1 This policy applies to the protection of all children, young people and vulnerable adults, 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.

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 Safeguarding and promoting the welfare of young people is defined for the purposes of this policy as:

- protecting young people from maltreatment
- preventing the impairment of mental and physical health or development
- ensuring that young people grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all young people to have the best outcomes

4.2 Child protection is part of the safeguarding process. It focuses on protecting individual young people identified as suffering from, or likely to suffer, significant harm. This includes child protection procedures which detail how to respond to concerns about a young person.

4.3 For the purposes of clarity, any person under the age of 18, is deemed to be a child. A vulnerable adult 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.

4.4 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.

4.5 The term ‘safeguarding children, young people and vulnerable adults’ embraces both reactive child protection and a preventative approach to keeping children, young people and adults safe.

4.6 Abuse can take many forms including physical, emotional, sexual and neglect. The college seeks to protect students from the range of abuse and safeguarding issues recorded in [Keeping Children Safe in Education \(KCSiE\) September 2022](#), in Part 1 and Annex B.

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.

5.2 Collyer’s has clear safeguarding objectives:

- i. To provide a safe environment for children, young people and adults in which to work, learn and take part in social and enrichment activity
- ii. 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
- iii. To take action where appropriate to safeguard students through working in partnership with other agencies
- iv. 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
- v. 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 will:

- i. Plan opportunities within the tutorial programme for young people to develop the skills they need to assess and manage risk appropriately and keep themselves safe
- ii. Be aware of and follow the [Sussex Child Protection & Safeguarding Procedures](#), produced by West Sussex, East Sussex, and Brighton & Hove. This will include the referral process
- iii. Be aware of the ‘early help’ process and understand their role in providing support for young people. This includes identifying problems and working effectively with other agencies that provide support to students
- iv. Support students in line with their Child Protection Plan and notify the Safeguarding Team of any child on a Child Protection Plan who has an unexplained pattern of absence
- v. If a young person is in immediate danger, know how to refer the matter to the Integrated Front Door and/or the Police immediately
- vi. 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
- vii. Appoint and train a Deputy Designated Safeguarding Lead, to act as the manager of day to day safeguarding issues with a well-trained Safeguarding Team
- viii. Ensure induction training provides effective coverage of college Safeguarding and Child Protection Procedures and KCSiE as mandatory for all new staff
- ix. 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
- x. Train staff to recognise signs of abuse and neglect and to appropriately refer concerns and take a safeguarding disclosure from a student should the need arise
- xi. Provide training updates on an annual basis
- xii. Keep accurate and secure records of concerns about individuals, even when there is no need for immediate referral to outside agencies

- xiii. 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
- xiv. Make sources of help and support accessible for anyone who may experience abuse
- xv. Develop effective working relationships with other agencies: Police, Social Services, Early Help, Health Authority and the West Sussex Safeguarding Children Partnership
- xvi. 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
- xvii. Appropriately filter and monitor student internet and IT usage.

In taking action, the college will have consideration for the following (5.4 - 5.13):

5.4 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 of personal and sensitive data.

5.5 Online 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.

5.6 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 online bullying and harassment, sharing 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.

5.7 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.

5.8 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 safeguarding and behaviour 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.

5.9 Prevent Duty

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.

5.10 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.

5.11 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 extra-familial risks in our local context as well as online, to ensure that staff are adequately prepared to manage such issues that arise from this.

5.12 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.

5.13 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 understand and record the underlying reason for absence. In cases where a safeguarding concern is known or suspected the Safeguarding Team will make an IFD 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 role of college staff

As a College we recognise that staff have a vital role to play in safeguarding young people because they are in a position to identify concerns early, provide help for young people, promote their welfare and prevent concerns escalating.

All staff have a responsibility to provide a safe environment in which young people can learn, and should be prepared to identify young people who may benefit from early help, which means providing support as soon as a problem emerges.

The Safeguarding Team will provide support to staff to carry out their safeguarding duties and will liaise closely with other services such as local authority children’s social care. The Deputy Designated Safeguarding Lead, directs the day-to-day work of the Safeguarding Team and all members of the Team are trained to DSL level, enabling them to advise on responses to safeguarding concerns.

6.2 What staff need to know

All staff:

- i. must read and understand the Safeguarding and Child Protection Policy
- ii. must read and understand Part 1 of KCSiE 2022. Staff who work directly with students must also read Annex B. Estates staff who have limited contact with students, may read Annex A of KCSiE instead of Part 1. (Staff should check with their line manager if they are unsure about which sections of KCSiE they are required to read and understand)
- iii. should be aware of systems and processes within the College which support safeguarding including:
 - safeguarding procedures (attached to this policy)
 - behaviour policy
 - related policies (see section12)
 - staff code of conduct
 - the importance of absence recording and reporting procedures
 - the role and identity of the Designated Safeguarding Lead/Safeguarding Team
- vi. should engage with safeguarding and child protection training (including online safety) provided at induction and through regular updates (for example, via email, meetings and inset)
- vii. should be aware of the process for referring a young person to the Safeguarding Team, where a referral to external services may be needed, for example to engage Early Help Teams and/or Children’s Social Care in supporting a young person
- viii. should know what to do if a young person tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as a member of the Safeguarding Team. Staff should never promise a student that they will not

tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the young person

- ix. should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report
- x. should be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, young people may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to a member of the Safeguarding Team if they have concerns about a young person
- xi. should build trusted relationships with students which facilitate communication
- xii. should know how to record and refer concerns using CPOMS, and how to assess risk in order to determine whether an immediate in-person referral to the Safeguarding Team is necessary
- xiii. must immediately refer to the Principal and/or the Senior DSL any concerns about the behaviour of another member of staff
- xiv. must immediately refer to the Chair of Governors and/or the Local Authority Designated Officer where the concerns are about the Principal

6.3 What staff should look out for

6.3.1 Early help

Any young person may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a student who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory EHCP)
- has a mental health need
- 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 or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the college day

6.3.2 Abuse and neglect

All staff should be aware of indicators of abuse and neglect (see Annex A), understanding that young people can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of students who may be in need of help or protection.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

All staff, but especially Heads of House, Pastoral Directors and the Safeguarding Team should consider whether young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Young people are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Young people can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to a member of the Safeguarding Team.

6.3.3 Safeguarding issues

All staff should have an awareness of safeguarding issues that can put students at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that young people are at risk. Additional information on some of the key safeguarding issues listed below along with information on a wider range of other safeguarding issues is included in Part 1 and Annex B of KCSiE.

6.3.3a Child-on-child or peer-on-peer abuse

Staff should be aware that children can abuse other children (often referred to as child-on-child or peer-on-peer abuse), and that it can happen both inside and outside College and online. Staff must familiarise themselves with the college's behaviour policy and procedures and understand the important role they have to play in preventing and responding to peer-on-peer abuse where they believe a student may be at risk from it. Even if staff have not received a report of it, they should not assume that it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse they should speak to a member of the Safeguarding Team, a HoH or the Director of Student Engagement. It is essential that all staff understand the importance of challenging inappropriate behaviours between students, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for young people and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.

6.3.3b Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

6.3.3c Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

6.3.3d Female Genital Mutilation (FGM)

Whilst all staff should speak to the Senior or Deputy DSL regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police.

6.3.3e Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken to refer the concern to the Safeguarding Team.

6.3.3f Serious violence

All staff should be aware of the indicators, which may signal a young person is at risk from, or is involved with, serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

6.4 What staff should do if they have concerns about a young person

If staff have concerns about a student's welfare, they should act immediately. Page 22 of KCSiE provides a general guidance flow chart, and Appendix 3 of this document provides a quick guide to the college's safeguarding referral process.

A DSL trained member of the Safeguarding Team will always be available during the sixth form college day to discuss safeguarding concerns. The Senior DSL's contact details are made available to staff undertaking offsite trips and residential visits along with details for the Local Authority 'Learning Outside the Classroom' support team. If in exceptional circumstances, a designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior management team and/or take advice from local authority children's social care (see Key Contacts in Appendix 1). In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

6.4.1 Information Sharing

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a young person is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information.

This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of young people.

6.4.2 Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college. Information should be kept confidential and stored securely. Safeguarding concerns and referrals must be recorded on CPOMS. Records should include:

- a clear and comprehensive summary of the concern (record as an 'incident')
- details of how the concern was followed up (record as 'actions')
- a risk assessment (use questions on CPOMS)
- decisions reached and the outcome (record as an action)
- safety plans should be added to CPOMS where needed (upload to files)

If in doubt about recording requirements, staff should consult a member of the Safeguarding Team.

6.5 What staff should do if they have a safeguarding concern or an allegation about another member of staff

If staff have safeguarding concerns (no matter how small) or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Principal or Senior DSL immediately
- where there are concerns/allegations about the Principal and/or Senior DSL, this should be referred to the Chair of Governors

Safeguarding concerns or allegations against staff that do not meet the harm threshold, will be treated as Low-Level Concerns (see Appendix 6).

6.6 What staff should do if they have concerns about safeguarding within the college

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college's safeguarding processes and know that such concerns will be taken seriously by the Senior Management Team. 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).

The college's 'Whistleblowing Policy and Procedure' provides a mechanism by which staff can voice concerns, made in good faith, without fear of repercussion. Where a staff member feels unable to raise an issue with Collyer's as their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them. General advice on whistleblowing can be found via: [Advice on Whistleblowing](#). The NSPCC's [Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way an issue is being handled by the college.

6.7 The Governing Body

The Governing Body takes seriously its responsibility to safeguard and promote the welfare of young people in its care and to work together with other agencies to ensure effective arrangements within the college to identify, assess, and support young people who are, or who may be, suffering harm. KCSiE makes clear that governing bodies should have a Governor to take leadership responsibility for the college's safeguarding arrangements and to ensure there are appropriate policies and procedures relevant to a sixth form college setting.

The Governing Body will:

- i. facilitate a whole college approach to safeguarding, ensuring that all our systems, policies and procedures operate with the best interests of young people at their heart.
- ii. ensure college policies and practices enable staff to take action in a timely manner to safeguard and promote the welfare of the young people attending the college.
- iii. ensure the wishes and feelings of young people are taken into account when determining what action to take and what service to provide.
- iv. ensure college systems are easily understood and accessible for young people to confidently report abuse.
- v. ensure our young people know their concerns will be treated seriously and will know they can safely express their views and give feedback.

6.8 Statutory Responsibilities of the Governing Body

We are aware of the statutory responsibilities placed on governing bodies which include:

6.8.1 Policies

- i. We will make sure the safeguarding policies and procedures in the college are effective and comply with the law. This will include a Safeguarding and Child Protection Policy which is reviewed at least annually and is made available publicly online.
- ii. We will make sure this policy:
 - o Describes procedures which are in accordance with government guidance
 - o Refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners
 - o Reflects the whole college approach to peer-on-peer abuse
 - o Reflects reporting systems
 - o Includes links to policies reflected elsewhere in Part Two of KCSiE
 - o Is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt
 - o Is available publicly via the college website.
- iii. We will have in place a **Staff Code of Conduct** which includes acceptable use of technologies, staff/student relationships and communications including use of social media.
- iv. We will have in place a **Student Behaviour Policy**.
- v. We will ensure appropriate safeguarding responses to students who do not attend or go missing during the college day.
- vi. We will ensure the Staff Recruitment Policy has regard for **safer recruitment procedures** outlined in Part 3 of KCSiE.
- vii. Where reasonably possible, our college will hold more than one emergency contact number for each student. This goes beyond the legal minimum, but we recognise that it is good practice for our college to have additional options to make contact with a responsible adult when a young person goes missing from education and is also identified as a welfare and/or safeguarding concern.
- viii. We will ensure the college always takes immediate steps to safeguard a vulnerable young person. For example, an inability to make contact with a parent/carer despite immediate and repeated efforts will not impede urgent safeguarding action, for example calling the Police for a young person who is at risk and has gone missing during the college day.

The Governing Body will through regular review, quality assurance processes and audit, ensure that any safeguarding deficiencies or weaknesses within the college are remedied without delay.

6.8.2 Appointing a Designated Safeguarding Lead and Deputies

The Governing Body will appoint a Designated Safeguarding Lead to take responsibility for safeguarding and child protection from within the Senior Management Team. Their Safeguarding responsibility will be explicit in the role-holders job description in line with Annex C of Keeping Children Safe in Education. The Governing Body will also ensure the appointment of a Deputy DSL to oversee the day-to-day work of the Safeguarding Team.

6.8.3 Training & Education for Safeguarding

The Governing Body will ensure appropriate safeguarding training is in place for all Governors at induction, to equip new Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole college approach to safeguarding. Governor training will be regularly updated.

The Governing Body will ensure regular and effective safeguarding training form part of the staff development programme and that students also receive Education for Safeguarding (including RSHE and Online Safety), within the Tutorial Programme.

6.8.4 Governing Body Response to Concerns and Allegations

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. The lead Governor on safeguarding may 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. The Governing Body will ensure appropriate liaison with the Local Authority Designated Officer (LADO) in the event of any allegation against a member of staff in accordance with Part 4 of KCSiE. The LADO may be consulted for advice where a concern is raised that may not meet the harm threshold but may need to be recorded as a Low Level Concern.

6.9 The Principal

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 they 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.

6.10 The Designated Safeguarding Lead (DSL)

The Senior DSL (Vice Principal (Pastoral) - Andrea John), supported by the Deputy DSL (Director of Student Support - Helen Mayer-Dean), is 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 IFD/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 the Safeguarding and Child Protection 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 & Inclusion (EDI) 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 Senior DSL, Deputy 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 safeguarding policies and procedures, to SMT and the Governing Body through the Quality & Curriculum 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 and Progression Team liaise effectively with employers and training organisations who receive young people from the college (on work placements or work experience) to confirm appropriate safeguards are in place
- supporting the Adult Education and Skills Manager to ensure Adult Learners are appropriately informed about Safeguarding and Child Protection at induction
- ensuring the Internationals Team conduct appropriate safeguarding checks and training with Homestay families.

The Deputy DSL takes responsibility for day-to-day operational management of the Safeguarding Team under the direction of the Senior DSL. The Deputy DSL has particular responsibility for management of Child Protection and Looked After Children, and is also the Designated Senior Mental Health Lead (DSMHL).

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 Behaviour Policy, Code of Conduct, EDI Policy, GDPR Privacy Notice, 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 Adult Education Advisor Team. Basic Safeguarding training will be included in the induction programme for Adult Learners. All learners will receive support in promoting their own wellbeing and that of others through the Safeguarding SharePoint site. 16-19 students will also receive Education for Safeguarding content through the Tutorial & Enrichment programme. Further forms of support will be communicated through the enrolment handbook, the StudentCommonRoom, 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:

- meetings between the Pastoral Officers of the Richard Collyer Union and the Vice Principal (Pastoral), minimum of 2 meetings per year;
- the Tutorial Programme and the Richard Collyer Union;
- Student Governor involvement on the Quality & Curriculum (Q&C) Committee and Governing Body.

8 Monitoring and reviewing policy and procedures

8.1 The Senior DSL will ensure that the Safeguarding and Child Protection Policy is reviewed on an annual basis. The Deputy DSL will 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.

8.2 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 Lead Governor for Safeguarding, 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.

9 Staff Training

9.1 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.

9.2 The Senior DSL, Deputy DSL 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.

9.3 Heads of House 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.

9.4 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.

9.5 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.

10 Related Policies & Procedures

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

- Complaints Policy
- Curriculum Policy
- Data Protection Policy incl CCTV and Use of IT
- EDI Policy
- Fire Safety Policy
- GDPR Privacy Notice
- Health and Safety Policy
- Recruitment Policy
- Risk Management Policy
- Sickness Management Policy
- Social Media Policy
- Staff Capability Policy
- Staff Code of Conduct
- Staff Disciplinary Policy
- Staff Grievance Policy and Procedures
- Stress Management Policy
- Student Behaviour Policy

- Support for Students Statement (Disability Statement)
- Use of Computers Agreement
- Whistleblowing Policy
- Work Experience/Trips and Visits Procedures

APPENDIX 1 - KEY CONTACTS

Contact Details for Safeguarding at Collyer's

Email for non-urgent safeguarding communications: safe@collyers.ac.uk

Please see APPENDIX 2 for information about safeguarding referral process.

Safeguarding Role	Name	Position	Contact Details
DSL (Member of SMT with responsibility for safeguarding)	Andrea John	Vice Principal (Pastoral)	asi@collyers.ac.uk 01403 210822 Ext 502
Deputy DSL (Operational Lead)	Helen Mayer-Dean	Director of Student Support (DSMHL)	hmd@collyers.ac.uk 01403 210822 Ext 704
DSL	Nicola Algar	Student Services Manager	nma@collyers.ac.uk 01403 210822 Ext 702
DSL	Helen Bolger	Head of Student Wellbeing	hxb@collyers.ac.uk 01403 210822 Ext 513
DSL	Eve Mitchell	Safeguarding Officer	exm@collyers.ac.uk 01403 210822 Ext 738
DSL	Berrin Penlington	Student Services Officer	bep@collyers.ac.uk 01403 210822 Ext 619
DSL	Tamsin Trent	Student Services Officer	tjt@collyers.ac.uk 01403 210822 Ext 742
Safeguarding Link Governor	Dr Grant Powell	Chair of Q&C Committee	SafeguardingGov@collyers.ac.uk
Chair of Governors	Graham Lawrence	Chair of Governors	Chair@collyers.ac.uk

Contact Details for External Agencies involved in Safeguarding

West Sussex Multi-Agency Integrated Front Door (Formerly MASH):

Tel: 01403 229900 (Out of Hours – 0330 222 6664)

WSChildrenservices@westsussex.gov.uk

Referrals to the Integrated Front Door (IFD)

- Urgent Referrals should be telephoned into the IFD on 01403 229900
- If you believe a child is in **immediate danger** you must **call the Police on 999**
- Referrals to the IFD should be made on the following web-based forms which can be accessed here:

Adults - <https://www.westsussex.gov.uk/raiseaconcernaboutanadult>

Children - <https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/>

Local Authority Designated Officers (LADO)

The LADOs for West Sussex:

- Miriam WILLIAMS
- Donna TOMLINSON

Assistant LADO for West Sussex:

- Sally ARBUCKLE

LADO Consultation Contact No: 0330 222 6450 (Mon – Fri 9.00am – 5.00pm)

LADO@westsussex.gov.uk

Safeguarding in Education Team

Tel: 03302 224030

Safeguarding.Education@westsussex.gov.uk

APPENDIX 2

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: 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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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: fm@fco.gov.uk

Safeguarding Disclosures

QUICK REFERENCE GUIDE TO DISCLOSURES AND REFERRALS

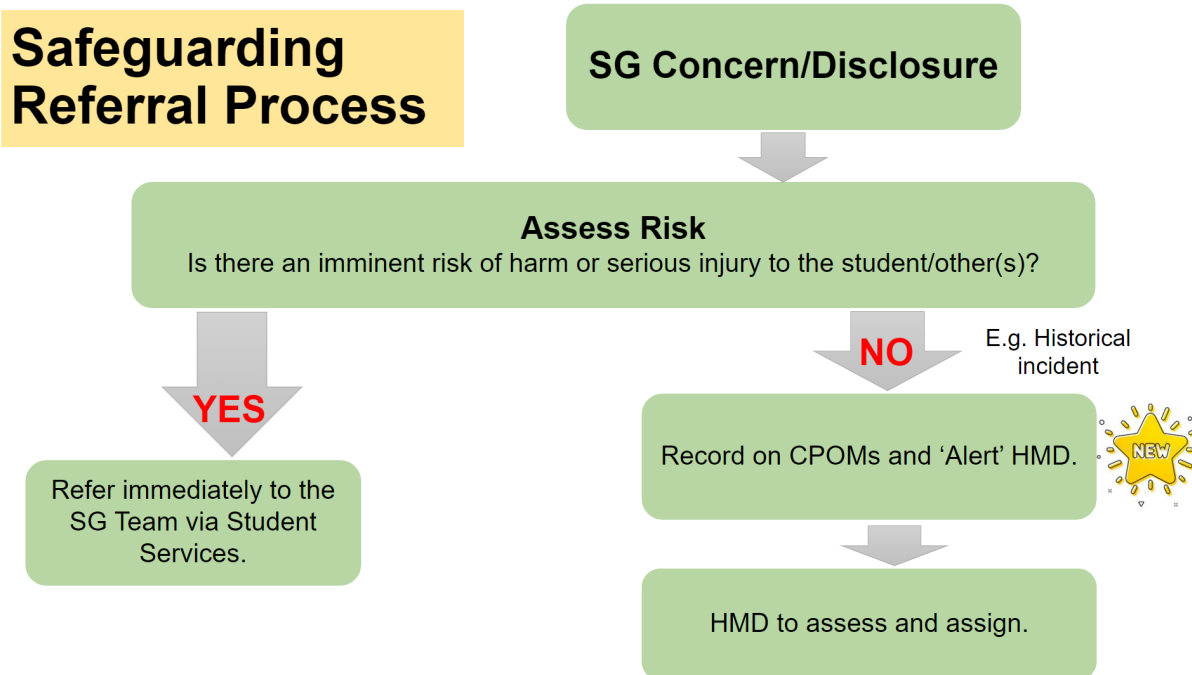


If a student approaches you and a discussion develops which raises a potential safeguarding concern, there are **two options** available to you:

- If you feel confident about supporting the student with the information they wish to share, it will be necessary to take a disclosure from that student to pass onto the safeguarding team.
- You may feel it would be more appropriate to refer the student directly to a member of the safeguarding team, for example, due to restrictions on your time in that moment or due to the nature of the information the student wishes to share. The most important thing is that the student is supported in making their disclosure so that appropriate referrals and support can be put in place.

<p>Taking Information / Disclosures – Advice When Talking and Listening to Students</p> <div style="border: 1px solid red; background-color: #ffe6e6; padding: 5px;"> <p>Do Not:</p> <ul style="list-style-type: none"> ▪ Use LEADING questions ▪ Use AGE inappropriate language ▪ Investigate ▪ Try to resolve ▪ Promise confidentiality ▪ Make assumptions </div>	<div style="border: 1px solid green; background-color: #e6ffe6; padding: 5px;"> <p>Do:</p> <ul style="list-style-type: none"> • Be approachable. • Listen carefully, and at the student's pace. • Take what is said seriously. • Only clarify essential information. • Reassure and tell the student what will happen next. • Tell a member of the Safeguarding Team without delay. • Record using the student's wording – do not paraphrase or interpret. </div>
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In cases where the student is **reporting an incident that has just taken place**, they should be brought to one of the Safeguarding Team – Student Services is the first point of contact for the Safeguarding Team.



APPENDIX 4

PROCEDURE: DEALING WITH A DISCLOSURE

REASSURE, RECORD, REFER

If a 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 they were right to tell someone
- Let them know that you understand how difficult it is to talk about such experiences
- 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 they are not to blame
- Make written record of what is said by the student – unprompted and in their own words
- Ensure accurate recording of dates and names where given
- 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
- Ask leading questions
- 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 (nudes)
- 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 a member of the Safeguarding Team.

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.

APPENDIX 5

Safeguarding Team - Case Management Procedure:

The Safeguarding Team meet on a weekly basis with the following agenda:

- a. key updates (as and when appropriate):
 - i. consideration of new guidance
 - ii. information from external agencies
 - iii. feedback from training/meetings
 - iv. discussion of any changes to systems/procedures
 - b. review new cases of students at high risk
 - c. monitor on-going high-risk cases
 - d. 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
- 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.
 - The Safeguarding Team will investigate all concerns and allegations, make an assessment of risk using the questions on CPOMS, conduct safety planning where needed and make a judgement on next steps in consultation with other DSLs, before referring on to appropriate external agencies as required.
 - Student case logs and risk levels are recorded on CPOMS with summary information on MyProgress where needed for communication with other staff who work with the student.

APPENDIX 6

Arrangements for safeguarding referrals out of normal college hours or in the event of college closure:

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

- If a safeguarding concern arises from communications from students during college closure, 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
- **If the concern is urgent**, you should contact the student's parent (unless this would put the student at greater risk)
- **If the concern is urgent and you are unable to speak to the student's parent/carer or need advice**, please contact the DSL Andrea John (07958 027968)
- If you are unable to get hold of the DSL, contact West Sussex Children's Services
Tel: 01403 229900 (Out of Hours – 0330 222 6664)
WSChildrenservices@westsussex.gov.uk
- **In an emergency** call 999

APPENDIX 7



Managing Low Level Concerns

What is a low-level concern?

KCSiE 2021 states that, as part of their whole school approach to safeguarding, schools and colleges in England should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in their staff code of conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

Where a concern about an individual's behaviour meets the threshold of an allegation, there has been clear guidance in KCSiE about how organisations should report, record and manage it. The term 'allegation' means that it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

(The [harm test](#) is explained in the Disclosure and Barring Service website).

Where a concern about an adult's behaviour falls below the threshold of an allegation, the position was much less clear until the Department for Education published its 2021 update of KCSiE which addresses the issue of Low Level Concerns. The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a student does not meet the threshold of harm.

NSPCC 2021

A low-level concern is any concern that an adult has acted in a way that:

- *is inconsistent with the staff code of conduct, including inappropriate conduct outside of work*
- *doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.*

Low-level concerns are part of a spectrum of behaviour. This includes:

- *inadvertent or thoughtless behaviour*
- *behaviour that might be considered inappropriate depending on the circumstances*
- *behaviour which is intended to enable abuse.*

Examples of such behaviour could include:

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

Farrer & Co

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

- *is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work,*

- *does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.*

How should a low-level concern be responded to by the Principal/DSL? [\(Farrer & Co\)](#)

Once the Principal or Safeguarding Lead has received the low-level concern, they should (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- 1) **speak to the person who raised the concern** (unless it has been raised anonymously), regardless of whether a written summary has been provided;
- 2) **speak to any potential witnesses** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- 3) **speak to the individual about whom the low-level concern has been raised** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- 4) **review the information** and determine whether the behaviour
 - i. is entirely consistent with their staff code of conduct and the law,
 - ii. constitutes a low-level concern,
 - iii. is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary,
 - iv. when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies, or
 - v. in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies.
- 5) where they are in any doubt whatsoever, **seek advice from the LADO - on a no-names basis if necessary**;
- 6) **make appropriate records** of:
 - i. all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
 - ii. all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);
 - iii. their determination (as above at 8.20(d));
 - iv. the rationale for their decision; and
 - v. any action taken.

If it is determined that the behaviour constitutes a low-level concern:

- a) it should also be **responded to in a sensitive and proportionate way** – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly and on a need-to-know basis;
- b) most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be **most appropriately dealt with by means of management guidance and/or training**;
- c) **in many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.** It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening (Miller & Rollnick, 1991);
- d) what Erooga has described in presentations as a **'values-based conversation' is more likely to be effective**, and help maintain a positive professional relationship with the member of staff concerned. Such an approach is characterised by a spirit of genuine enquiry. For **example**, "I am sure you subscribe to our organisational values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again..;"
- e) any such conversation should include:

- **being clear with the individual as to why their behaviour is concerning, problematic or inappropriate,**
- **what change is required in their behaviour,**
- **enquiring what, if any, support they might need in order to achieve and maintain that,**
- **and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.**

Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;

- f) **some low-level concerns may also raise issues of misconduct or poor performance.** The Headteacher/Principal or Safeguarding Lead should also consider whether this is the case – by **referring to the organisation's disciplinary and/or capability procedure and taking advice from HR** on a named or no-names basis where necessary. If the Headteacher/Principal or Safeguarding Lead considers that the organisation's disciplinary or capability procedure may be triggered, they should refer the matter to HR. Any such referral should be made by the Headteacher/Principal or Safeguarding Lead having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the Headteacher/Principal or Safeguarding Lead and HR, so that an holistic view of the individual can be taken. **Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR;**
- g) as explained earlier in this guidance, an organisation's written low-level concerns policy should apply to any adult working in or on behalf of the organisation – so that low-level concerns can be self-reported by and/or shared about them. KCSIE states that where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. How an organisation responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee, or worker to whom the organisation's disciplinary procedure would apply; or a contractor, Governor, Trustee, Director or volunteer who may be subject to alternative procedures. The organisation's response will need to be tailored accordingly, in respect of which they may wish to seek specialist legal advice;
- h) some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate. **Where low-level concerns are raised which in fact require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. Organisations should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO;**
- i) if HR advise that the organisation's disciplinary procedure is triggered, **organisations must ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.** If an organisation ultimately disciplines or dismisses a staff member for cumulative alleged 'breaches' of the staff code of conduct which were not brought contemporaneously to the individual's attention, and to which they have not had a proper opportunity to respond, clearly there will be a lack of fairness and natural justice and the risk of a finding of unfair dismissal by an Employment Tribunal.

How should low-level concerns be held? ([Farrer & Co](#))

Whereas KCSIE requires schools and colleges in England to keep allegations on staff personnel files unless they are malicious, **no guidance exists, in KCSIE or otherwise, on the storing of records relating to low-level concerns.**

Organisations should retain all records of low-level concerns (including those which are subsequently deemed by the Principal or Safeguarding Lead to relate to behaviour which is entirely consistent with the staff code of conduct) in a **central low-level concerns file** (either electronic or hard copy).

Where **multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record, and with a timeline alongside.** These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Principal or Safeguarding Lead, and Head of HR.

The Principal or Safeguarding Lead may store the central low-level concerns file with the other safeguarding and child protection records. The rationale for storing such records on a central file, rather than in staff members' personnel files, is that:

- a) it makes it easier to address possible issues such as lack of clarity in the staff code of conduct, and to review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour;
- b) it reassures staff and encourages them to share low-level concerns.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger an organisation's disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this **should be done in the normal way**, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

Should a low-level concern be referred to in a reference? [\(Farrer & Co\)](#)

KCSIE prohibits schools and colleges in England from referring to unsubstantiated, malicious or false allegations in references. **Only safeguarding allegations that have been substantiated should be included in references.** KCSIE states that:

- where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference
- low level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

APPENDIX 8

PREVENT

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

The Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

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 Guidance for Further Education institutions in England and Wales](#) gives more specific guidance for colleges.

The following values, described by the DfE as fundamental British Values, are embedded within our staff and student Codes of Conduct, and the Mission, Vision and Values of the college. Students agree to adopt these values when approving their Learning Agreement. The college endeavours to develop further awareness and understanding of the values through the Tutorial Programme and information displayed around the campus.

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

The college’s Prevent Duty Risk Assessment and Action Plan is updated regularly by the Senior DSL alongside other Risk Registers. The DDSL works with our DfE Prevent Lead, the IFD and Police to fulfil our duty which includes providing awareness training for staff and students and ensuring effective IT filtering and monitoring.

Procedure

Prevent concerns are managed in the same way as other safeguarding issues at Collyer’s. Staff are expected to follow the usual safeguarding referral procedures if they have a concern about a student and the Safeguarding Team will follow-up the referral in consultation with our DfE Prevent lead and/or the IFD as appropriate.

APPENDIX 9

ONLINE SAFETY

All students receive information about how to keep themselves safe and secure online at induction, through the Use of Computers Agreement and through student SharePoint sites. 16-19 students also cover topics such as grooming, radicalisation and online harassment through the Tutorial Programme.

The college utilises Smoothwall filtering and monitoring software to block potentially harmful content and to alert the safeguarding team to any potential online risks. Smoothwall Monitor picks up keystrokes and uses both AI technology and a monitoring team to construct and send alerts which are categorised according to risk.

Procedure for dealing with Smoothwall alerts:

- Alerts at risk level 3 and above are sent to the Safeguarding Team, including the Vice Principal (Pastoral), Director of Student Support and Director of Student Engagement.
- The Director of Student Engagement triages all behaviour-related alerts, directing teachers, tutors or Heads of House to conduct further investigation or take disciplinary action as appropriate.
- Urgent Safeguarding referrals will be dealt with by the first available member of the safeguarding team, who will inform other members of the team that they have actioned the alert.

Remote Learning

The college 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 are learning at college.

During a period of remote learning:

- The college continues to ensure that as far as possible, [appropriate filters and monitors are in place](#)
- 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
- 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](#).

APPENDIX 10

Use of Reasonable Force (to be added)

Student Guidance

REPORTING UNWANTED SEXUAL BEHAVIOURS

A Guide to How We Can Help You

The college actively encourages students to report any incidences of unwanted sexual behaviour, (including unwanted touching, messages, or intimate questions), to any member of staff, including their tutor, teachers, and any member of the safeguarding team.

Please be reassured that the college will take any disclosures of unwanted sexual behaviour very seriously. You will be offered support and the college will take any action required to address the issues. We want to make it clear that we have a zero-tolerance approach to sexual violence and sexual harassment - it is never acceptable and will not be tolerated.

Harmful Sexual Behaviours (HSB)

In some cases, the unwanted sexual behaviour you have been subjected to may constitute a 'Harmful Sexual Behaviour', (HSB). These are regarded as crimes and examples include [sexual harassment](#), [sexual assault](#) and [rape](#). Also, online sexual abuse, for example, [non-consensual sharing of sexual images](#) (sharing nudes without your permission) is also a crime.

If you report an HSB to us, the college has a legal duty to refer your disclosure to an external agency called the Integrated Front Door (IFD). This referral is required because the college does not have the power to investigate crime and we have a duty to protect other young people. Our role is to support you in making your disclosure, record what happened and refer it on quickly so that the right action can be taken. This is the case even if you have decided not to report the crime to the Police and do not wish to take the matter any further.

On receiving the referral, the IFD team will gather relevant information about you, your family and the incident reported. A team will then decide if and who the case needs to be referred to. This might include the Police, social services, CAMHS and other supporting agencies, such as the [Lifecentre](#), (who offer bespoke counselling).

Once a referral has been made to the IFD, how the incident is then dealt with falls to the agencies it has been referred to, for example, the Police. Our role is

to support you through the process (even if that involves defending your right not to take the matter further), and ensure you are safe at college.

What we can do at college:

- Communicate confidentially with your tutor and your teachers to alert them to the fact that you are experiencing difficult times and request their support.
- Offer counselling/wellbeing and study support.
- Take disciplinary action where there is evidence of a breach in the college code of conduct.
- If the person who is accused of the HSB is in college, we will put together a safety plan to ensure you are safe on site.
- Meet with you regularly to guide you through the process, for example, if the Police do investigate and charges are brought against the other person.
- Liaise with external agencies. For example, the Police may contact us for information about the impact the reported crime is having on you and your ability to engage with college.
- Signpost external support, e.g., Victims' Support <https://www.victimsupport.org.uk/>

What we unable to do:

- Investigate a crime and /or determine guilt.
- Take any disciplinary action unless there is evidence. For example, evidence that the student has breached the college Code of Conduct, or they are convicted of the crime.

Help and Support for Victims of Crime

Firstly, although we would always encourage you to disclose that you have been a victim of a sexual crime, we completely understand if you feel that you do not wish to engage with the processes outlined above. If you do decide not to report, we still want to make sure you have access to confidential, bespoke support, and that you feel safe when you are at college. It is important that you do not feel you have to deal with it on your own.

A really useful resource whether you decide to report the crime or not is [The Victims' Code](#). This sets out your rights as a victim of a crime and explains the different stages of any Police investigation and support you can access, (whether you report the crime to the Police or not). You can report online abuse and bullying to [CEOP](#) who help to support the safety of young people online. [Think U Know](#) has non- judgemental advice for victims of non-consensual image sharing and [Report Remove](#) will help you get an online image removed.

The [Student Services SharePoint](#) also has a wealth of information in the 'Safeguarding' section about organisations who offer support.