

Safeguarding Policy

Policy Details			
Policy Owner	Head of Student Services		
CE Sponsor	Vice Principal: Student and Information Services		
Date created this year	25 October 2023		
Version:	Approved by:	Date approved:	To be reviewed:
1	College Executive / Senior Leadership Team	07 November 2023	November 2024
1	Curriculum and Quality Committee	16 November 2023	November 2024
1	Corporation Board	14 December 2023	December 2024

Equality Impact Assessment Tool

		Yes/No	Comments
1	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race or ethnicity	No	
	Disability	No	
	Gender	No	
	Religion or belief	No	
	Sexual orientation	No	
	Age	No	
	Marriage and Civil Partnership	No	
	Maternity and Pregnancy	No	
	Gender Reassignment	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4	Is the impact of the policy/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	

Section	Title	Page
1.	Introduction	5
2.	Aims and Principles	6
3.	Purpose	6
4.	Statutory Framework	7
5.	Definitions	7
6.	Scope and Application	8
7.	Roles and Responsibilities	9
8.	Students and Apprentices potentially at greater risk	11
9.	Early Help	12
10.	Interagency Working	12
11.	Types of Abuse and Neglect	13
12.	Further Safeguarding Issues	13
13.	Managing Disclosures: The 5 Rs	18
14.	Procedures for staff - Reporting Concerns	18
15.	Confidentiality	19
16.	Information Sharing	19
17.	Circumstances for safeguarding referral made by staff (non-Safeguarding Officer)	20
18.	Use of Reasonable Force or Physical Intervention	21
19.	Allegations or concerns against staff, volunteers, governors, or contractors.	22
20.	Relationships between staff and students including Apprentices	22
21.	Whistleblowing	24
22.	Students on Alternative Year 11 Programmes (15 – 16-year-olds)	24
23.	Student Work Experience and Industry Placements	25

24.	Records	27
25.	Awareness of Safeguarding for students, apprentices, and parents	27
26.	Recruitment of Staff and Volunteers	27
27.	Staff Training and Support	27
28.	Communication of Policy	28
29.	Reports to the Governing body	28
30.	Monitoring and Review	28
31.	Associated Policies and Documents	29

Appendices

Appendix	Title
1.	Safeguarding Concerns 1 - Form for staff use if required
2.	Flow Chart - Staff Referral to a Safeguarding Officer
3.	Flow Chart followed by Safeguarding Officers – Concern about a child or Adult at Risk
4.	Children and Families Windscreen of Need
5.	Children and Families Service Map – under 18-year-olds
6.	Record of Reasonable Force/Physical Interventions
7.	Safeguarding Officers – Current list of contacts

COLCHESTER INSTITUTE

SAFEGUARDING POLICY

1. Introduction

Colchester Institute is fully committed to the well-being of its students and apprentices. The College works to actively support and promote the positive welfare of all students and apprentices including children, adults at risk and those with SEND and expects all staff and volunteers to share, promote and practise this commitment at all times. Safeguarding and promoting the welfare of our students and apprentices is everyone's responsibility.

This Policy represents Colchester Institute's response to the need to protect all enrolled students and apprentices especially children and adults at risk and those with SEND at all College Campuses and organisations that carry out work on behalf of Colchester Institute.

The intent of the Safeguarding Policy is to ensure that:

- a safe environment is provided for students and apprentices at all times;
- students and apprentices (child or adult) who are at risk of and/or likely to suffer significant harm are identified, and appropriate action taken with the aim of making sure they are kept safe, both at college and at home or elsewhere;
- there exist safe recruitment practices in checking the suitability of staff and volunteers to work with or in proximity to students and apprentices;
- staff are made aware of issues relating to the welfare of students and apprentices;
- this policy applies to all students and apprentices regardless of gender, ethnicity, disability, sexuality, or religion.

Working within this policy and linked policies demonstrates Colchester Institute's compliance to the duty placed on colleges to keeping children, young people, and adults at risk safe and promoting their welfare in these ways:

- Protecting from maltreatment
- Preventing impairment of children's mental health and physical health or development
- Growing up in a safe and cared for environment
- Taking action to enable the best outcomes

This policy should be read in conjunction with the Colchester Institute Staff Code of Conduct and Safeguarding Protocol for Staff.

The Staff Code of Conduct states that relationships between staff members and students and apprentices who are adults at risk are strictly prohibited as well as relationships between staff members and students and apprentices under 18 years of age. These types of relationship could be viewed as an abuse of the staff member's position of trust and breach of the standards of professional conduct expected at Colchester Institute. Any member of staff who enters into such a relationship should be subject to the College's disciplinary procedure. This behaviour is likely to constitute gross misconduct, which could lead to summary dismissal and a referral to the Disclosure and Barring Service, and could also potentially be a criminal offence under the Sexual Offences Act 2003

In addition to Colchester Institute's Safeguarding Policy staff must have an awareness of Keeping Children Safe in Education 2023 and the Southend, Essex, and Thurrock (SET) Procedures for Safeguarding Children and Adults and use for reference where necessary.

2. Aims and Principles

The College is committed to the rights of students and apprentices within all its learning locations; it is committed to promoting their welfare, protecting their physical and emotional wellbeing and safeguarding them from all forms of abuse. Colchester Institute expects all staff, volunteers, and contracted staff to share this commitment. The College will act in ways that best safeguard the interests of students and apprentices.

The College is committed to the following safeguarding principles and practices:

- the needs and interests of students and apprentices are paramount;
- all people working under the auspices of the College carry a responsibility for safeguarding and promoting the welfare of students and apprentices
- all College staff should be prepared to identify children and adults at risk (students and apprentices) who may benefit from early help

3. Purpose

The purpose of this Policy is to ensure that Colchester Institute has effective systems in place for safeguarding students and apprentices.

The College fully supports the objectives outlined in the guidance Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2018), SET Procedures for Children and Young People and SET guidelines for Safeguarding Adults in order to help keep students safe by contributing to:

- providing a safe environment for students and apprentices to learn in education settings;
- identifying students and apprentices who are suffering or who are likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in College;
- implementing safer recruitment policies and the development of safe and secure environments for learning with appropriate supervision and support for staff;
- creating supportive environments which enable students and apprentices to be able to speak out;
- managing concerns sensitively and promptly referring to statutory agencies including Children's Social Care, Adult Social Care and/or Police;
- actively participate when required in Child in Need meetings, Child Protection panels, Channel panels and/or, Counter Terrorism local profile meetings;
- maintain a relationship with the Essex Safeguarding Children Board by attending Local Stay Safe meetings and, when requested, the Local Children's Partnership Board and subgroups;
- maintaining confidentiality and only sharing information relating to individual students, apprentices, and families on a strictly 'need to know' basis
- recognising that the College does not have an investigatory role in child protection; the role is to ensure that concerns are passed on without delay to agencies that have a statutory responsibility to investigate i.e., Social Care and the Police;
- ensuring that all employees of the College have access to an appropriate level of information, instruction, and training to ensure that the College's policies, practices, and procedures are used and understood by all members of staff;
- supporting students and apprentices who may have been abused in accordance with their child protection plan;
- ensuring that where the College sub-contracts to outside agencies, the service provider is required to have an up to-date Safeguarding and Child Protection policy or subscribe to the principles of the College's Safeguarding Child Protection Policy and is responsible for ensuring that those working closely with, or supervising students are DBS checked appropriately.

This policy will be subject to continual revision to reflect statutory review.

4. Statutory Framework

The Police and Social Services have primary responsibility in the field of child protection. The Children Act 2004 places a duty on local authorities to take steps to protect students in appropriate circumstances.

The Education Act 2002 ensures that responsibilities under the Education Acts are carried out with a view to safeguarding and promoting the welfare of students.

Working Together to Safeguard Children publishes the legislative requirements placed on individual services in relation to inter-agency working to safeguard and promote the welfare of children.

Keeping Children Safe in Education 2023 outlines statutory guidance that specifically schools and colleges must and should have regard to when carrying out their duties to safeguard and promote the welfare of children.

The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g., a lecturer or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is an enrolled student or apprentice and the person works in the same establishment as the child, even if s/he does not teach the child. It can also potentially be an offence under this Act for such a staff member to have a sexual relationship with an adult at risk.

The Counter-Terrorism and Security Act 2015, places a duty on specified authorities, including local authorities and childcare, education, and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

The College takes account of guidance issued by the Department for Education, the Disclosure and Barring Service and other relevant bodies and groups.

The College is committed to working with and assisting the local children's departments with regard to child protection matters and is committed to liaising with the Essex Safeguarding Children Board and/or local Stay Safe Groups.

The College are aware of obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty and local multi-agency safeguarding arrangements (SET procedures for Children and Adults)

5. Definitions

For the purposes of this policy the term "student" or "apprentice" will be used to cover the following categories:

Child: – The definition of 'child' in the Children Act of 1989 and 2004 is 'any person who has not reached their 18th birthday'

Adults at Risk - The Care Act 2014 uses the definition below to highlight who adult safeguarding responsibilities apply to. Within this policy we refer to people who fulfil this definition as adults at risk.

1. Adult has care and support needs, and
2. Is experiencing, or is at risk of, abuse or neglect and
3. Is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

Those who meet the criteria can include:

- Adults with care and support needs regardless of whether those needs are being met by the local authority
- Adults who don't have clearly identified needs, but who may still be vulnerable
- Adults who manage their own care and support through personal or health budgets
- Adults who fund their own care and support
- Children and young people in specific circumstances (will be supported via Adult Safeguarding agencies)

(SET Safeguarding Adults Guidelines 2022 V8)

This Safeguarding Policy will also apply to any other adult student or apprentice deemed to be at immediate risk of harm and therefore needing additional help or support in a crisis situation or over a longer period of time.

Work experience (GAP at Colchester Institute) - short and clearly defined as work experience which has a focus and aim of improving employability skills.

Industry Placements, including T Levels – a minimum of 315 hours with an external employer in a role relevant to the student's course. The placement should be clearly defined, the main aim being to build and develop technical skills and gain industry relevant knowledge, with Employers checked against DfE - Department for Education Guidance.

Work Placements – required on some study programme as part of the curriculum programme for example: Early Years and Health and Social Care.

6. Scope and Application

The Safeguarding Policy exists to safeguard all Colchester Institute enrolled students and apprentices, whether they study at the main College campuses, satellite centres or other designated areas. The application of this policy must be applied and followed, by college staff, Governors, contractors, contracted staff, sub-contracted staff, volunteers whether they work main College campuses, satellite centres or other designated areas. The policy is applicable to all College on and off-site activities undertaken by students and apprentices whilst they are actively enrolled at Colchester Institute.

The policy applies to students and apprentices on work experience and placement programmes and those engaged on any College organised off-site activity.

The policy applies to working arrangements with other agencies including schools, employers, and support agencies.

The policy applies to students and apprentices who are external candidates and on the premises for the purpose of taking an examination.

The policy applies to apprentices who are enrolled at Colchester Institute. The College recognises that safeguarding apprentices who may not be geographically based near the College or come onto college site is not without its challenges. Where it is not possible to meet the student in person to discuss concerns, due to geographical constraints, safeguarding advice and procedures will be followed by telephone with the apprentice to ensure their safety.

Employers of apprentices are able to access the College's Safeguarding Officers for advice and signposting.

7. Roles and Responsibilities

The Governing Body

The Governing body ensures that the policies, procedures and training in our college are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the safeguarding policy reflects statutory and local guidance and that it is reviewed at least annually.

The governor for safeguarding arrangements is named below. This governor takes strategic responsibility at governing body level for safeguarding arrangements in our college. The governing body ensures there is a named Designated Safeguarding Lead and at least one deputy safeguarding lead in place (also named below)

The Governing body ensures the college contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The Governing body ensures that all adults in our college who work with students and apprentices undergo safeguarding training at induction as appropriate and that it is regularly updated. All staff members receive regular safeguarding updates, at least annually, to provide them with the relevant skills and knowledge to keep our students safe.

The Governing body ensures our students and apprentices are taught about and made aware of safeguarding through personal development opportunities.

The Governing body and College Executive team are responsible for:

- ensuring we have in place safer recruitment procedures that help to deter, reject or identify people who might abuse children, young people and or adults at risk
- ensuring we meet statutory responsibilities to check adults working with children, young people and adults at risk and have recruitment and selection procedures in place (see Safer Recruitment Policy available from Human Resources)
- online safety (including strategic oversight of filtering and monitoring systems to support this)

Designated Governor for Safeguarding

Kevin Prince is the Designated governor with responsibility for safeguarding students, apprentices, and adults at risk.

The Designated governor is responsible for liaising with the Principal and the Designated lead over matters regarding safeguarding students, apprentices, and adults at risk and takes strategic responsibility for Safeguarding at Governing body level including: -

- ensuring that the College has procedures and policies to meet its legal duties, and which are consistent with Keeping Children Safe in Education, the Essex Safeguarding Children Board and Essex Safeguarding Adults Board procedures;
- ensuring that the Corporation Board considers the College policy on Safeguarding and Child Protection each year;
- ensuring that the Governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

The Designated governor is also responsible for overseeing the liaison between Essex County Council Social Services in connection with allegations against the Principal and Governors. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

The Designated Safeguarding Lead (DSL)

Maeve Borges, Vice Principal: Student and Information Services, is the College's Designated Safeguarding Lead and is the member of the College Executive team with responsibility for safeguarding students, apprentices, and adults at risk.

The DSL receives appropriate training in child protection issues and inter-agency working and will receive refresher training at least every 2 years.

The DSL in College has ultimate lead responsibility for safeguarding. The DSL with responsibility for Safeguarding is responsible for:

- overseeing the referral of cases of suspected harm or abuse or allegations against staff to Essex County Council Social Services and the relevant investigating agencies;
- ensuring that advice and support is given to staff on issues relating to safeguarding and child protection, including online safety;
- ensuring that a proper record of any safeguarding referral, complaint or concern is maintained (even where that concern does not lead to a referral).
- ensuring that parents of students and apprentices within the College are aware of the College's Safeguarding and Child protection policy;
- ensuring that the College engages with the Local Authority and Essex Safeguarding Children Board and other appropriate agencies;
- ensuring that the College liaises with secondary schools which send students and apprentices to the College to ensure that appropriate arrangements are made for the students;
- ensuring that the College liaises with employers and training organisations that receive students from the college on long term placements to ensure that appropriate safeguards are put in place;
- ensuring that staff receive training, appropriate to their role, in safeguarding and child protection issues and are aware of the College Safeguarding Policy and Procedures.
- ensuring that staff receive updates on Safeguarding and Child Protection matters at the very minimum annually.
- working with the local authority and the ESCB as required and ensure that information is shared appropriately.
- working with senior leadership colleagues to ensure filtering and monitoring (online safety) remains robust and fit for purpose.

Deputy Designated Safeguarding Leads (DDSL)

Deputy to the Designated Lead: -responsible for deputising for the Safeguarding Lead (DSL) in their absence:

- **Kirsty Russell, Head of Student Services**
- **Adam Ward, Assistant Principal, Braintree Campus and STEM**

The College Safeguarding Team

The College have a team of dedicated Safeguarding Officers. The list of current safeguarding officers is given in Appendix 7.

The Safeguarding Officers:

- report to the Designated Safeguarding Lead or their Deputy;
- are available to support students and apprentices who have concerns about their safety and or make disclosures;
- work with and support students and apprentices where concerns are raised by the student or apprentice, staff, parents/carers, other agencies;
- know how to make and make appropriate referrals to Social Care, the Police, Prevent Team and other agencies;

- are available to provide advice and support to staff on issues relating to safeguarding and child protection;
- deal with individual cases, including case conferences, review meetings, as appropriate;
- keep and safely store accurate records of safeguarding concerns, even when these do not lead to a referral;
- have received training in safeguarding issues and inter-agency working, as required by the Essex Safeguarding Children Board, and refresher training at least every 3 years

All College Staff

- Everyone in our college has a responsibility to provide a safe learning environment where students and apprentices can learn. All staff are aware of the types of abuse and safeguarding issues that can put students and apprentices at risk of harm, so we are able to identify students and apprentices who may be in need of help or protection. We understand that behaviours linked to issues such as drug taking and/or alcohol misuse, missing education and consensual/non-consensual sharing of nudes and semi-nudes images can be signs that children are at risk.
- All staff members are aware of and follow the college safeguarding processes (as set out in this policy). Staff understand that, if they have any concerns about a student's welfare, they must act on them immediately and speak with the College Safeguarding Team – we do not assume that others have taken action.
- Our staff understand that students and apprentices may not always feel able or know how to tell someone that they are being abused. This may be because they are embarrassed, scared or do not recognise they are experiencing abuse, either at home or out in the community. We understand there are many factors which may impact on our student's welfare and safety and we also understand safeguarding in the wider context (contextual safeguarding). We recognise that abuse, neglect and safeguarding issues rarely occur in isolation and that, in most cases, multiple issues will overlap.
- Our staff will always reassure students and apprentices who report abuse that they are taken seriously and that they will be supported and kept safe. We will never make a student feel ashamed for reporting abuse, nor make them feel they are causing a problem.

8. Students and apprentices potentially at greater risk from harm

Children and adults with SEND can face additional safeguarding challenges. It is important that these additional challenges are remembered when recognising abuse and neglect in this group. Keeping Children Safe in Education publishes the additional barriers as:

- assumptions that indicators of possible abuse such as behaviour, mood, injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other groups
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Looked after children and previously looked after children (Children in care)

- Looked after children mainly become looked as a result of abuse and/or neglect. The College should ensure staff have the skills, knowledge and understanding to keep looked after children safe. At Colchester Institute, we have a Welfare and Safeguarding Officer that supports our Looked After Children, attending reviews, undertaking PEPs, being the point of contact for the young person, carers, social worker and liaises with the course area to ensure support is available.

Care Leavers

- Students who have left care may also be more vulnerable. The Local Authority have on-going responsibilities to young people who cease to be looked after and become care leavers. The College's welfare and safeguarding officer who supports looked after children will work with the local authority personal adviser to support the student to ensure support to participate in education or training.

Students and apprentices requiring mental health support

- People who require mental health support whilst at Colchester Institute will be supported, once disclosed, by the College's Welfare and Safeguarding Team. The team will work together with the person and parents/carers (unless this places the young person at risk) to access support from key agencies including the Emotional Wellbeing and Mental Health Service. In College support will be provided by the Welfare and Safeguarding team in collaboration with the young person's course team.

LGBTQ+

- Staff are aware that young people who are lesbian, gay, bi, trans (LGBT+) can be targeted by other young people and that young people who are perceived by other young people to be LGBT+ (whether they are or not) can be just as vulnerable as young people who identify as LGBT+.

9. Early help

Keeping Children Safe in Education 2023 states:

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- 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 for the child, 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, or
- is persistently absent from education.

10. Interagency Working

It is important that agencies work together to keep children safe, and there is a legal requirement to do so.

The College works with other agencies to safeguard students and attends statutory meetings that they are invited to in respect of a young person that is enrolled at the College. This could include Children in Care of the Local Authority, Child in Need Core Groups or Child Protection conference, Multi Agency Child Exploitation meetings (MACE) and or Multi Agency Police Protection arrangement (MAPP).

11. Abuse and neglect– what to look out for

Keeping Children Safe in Education (DfE, 2023) describes abuse in the following way:

“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”

Keeping Children Safe in Education refers to four categories of abuse:

- Physical
- Emotional
- Sexual
- Neglect

Possible indicators of abuse or neglect.

Neglect: The persistent failure to meet a student or apprentice’s basic physical and psychological needs, likely to result in the serious impairment of their health or development.

Emotional Abuse: The persistent emotional ill-treatment of a student or apprentice such as to cause severe and persistent adverse effects on their emotional development.

Physical Abuse: Actual or likely physical injury to a student or apprentice, or failure to prevent physical injury or suffering to a student or apprentice including deliberate poisoning, suffocation or inducing or fabricating illness (formally known as “Munchausen’s syndrome by proxy”).

Sexual Abuse: Involves forcing or enticing a student or apprentice to take part in sexual activities, whether or not the student or apprentice is aware of what is happening. Includes Child Sexual Exploitation.

Financial Abuse - financial abuse takes many forms, from denying someone access to funds, to making someone solely responsible for money while the other person is handling money irresponsibly. Money becomes a tool by which the abuser can further control the victim.

Contextual Safeguarding and risk in the Community

Safeguarding incidents and behaviours can be associated with factors outside of college. This is referred to as contextual safeguarding. Staff are alert to look out for wider factors that may be in a child’s or adult at risk’s life that could be a threat to their safety and / or welfare. To this end, we will consider relevant factors when gathering information of any risk to a child or adult at risk and share it with other agencies to support better understanding of the child or adult at risk.

12. Further Safeguarding Issues

a) Radicalisation and Prevent

Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Keeping Children Safe in Education (September 2023) states:

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard” to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty is seen as part of the College’s wider safeguarding obligations.

The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel Panels are in place. The panel must include the local authority and chief officer of the local Police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the Police, and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners which includes FE Colleges to cooperate with the Channel Panel in the carrying out of its functions and with the Police in undertaking the initial assessment as to whether a referral is appropriate.

Colchester Institute will engage with the Channel Panel, Police Engagement Officer for Radicalisation and Counter Terrorism Local Profile Meetings as required.

The College treats all concerns relating to radicalization and extremism as a safeguarding concern. Young people and adults at risk are particularly targeted by groups who may promote extremist activity.

College staff should be aware of the signs of radicalisation and have confidence to report concerns to a Safeguarding Officer.

The College will also promote the ethos of the “Prevent” agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, group tutorials and induction activities, a belief in equality of opportunity and celebration of diversity.

The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.

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

The College will provide appropriate support through its own staff or by referral to external agencies, for any student or apprentice vulnerable to radicalisation.

b) So-called ‘honour-based violence’ (including Female Genital Mutilation and forced marriage)

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. We understand that this form of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.

As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of FGM where it appears to have been carried out on a girl under the age of 18. Our college operates in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

A *forced marriage* is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime.

In addition to the above since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial “marriages” as well as legal marriages.

Our staff understand how to report concerns to the Safeguarding team.

c) Criminal Exploitation (CE) of children and adults at risk and Child Sexual Exploitation (CSE)

Both CE and CSE 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 or adult at risk 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. CE and CSE can affect children and adults at risk both male and female and can include children and adults at risk who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CE can include children and adults at risk being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

CSE is a form of child abuse, which can happen to boys and girls from any background or community. It may occur over time or be a one-off occurrence. In Essex, the definition of CSE from the Department of Education (DfE, 2017) has been adopted:

"Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".

Education has an important part to play in raising the awareness of this issue with young people and adults at risk. The College responds to reports or concerns of criminal exploitation of children and adults at risk and CSE including direct involvement of a child or adult at risk or being at risk of involvement, as a safeguarding concern.

d) Allegations of peer-on-peer abuse and peer on peer sexual abuse

Keeping Children Safe in Education 2023 uses the term child on child sexual abuse, due to the varying age of students at our college we are retaining the term peer on peer.

The College recognises that some students and apprentices may abuse their peers and that this may happen in college, or outside of it. Any incidents of peer-on-peer abuse are a safeguarding concern. We will seek advice, support and work with other agencies including the Police and Social Care, as appropriate.

The College recognises that, even though peer on peer abuse, including harmful sexual abuse, may not be reported, it is likely that it is occurring, and the College must have a clear zero tolerance to inappropriate or abusive behaviour. The College also understands the barriers which may prevent a student or apprentice from reporting abuse and work actively to remove these.

Peer on peer abuse can manifest itself in many ways. This may include bullying, harassment (including cyber bullying), physical abuse, sexual violence / sexual harassment, 'up-skirting', 'sexting' or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour in college and will take swift action to intervene where this occurs, challenging inappropriate behaviours when they occur – we do not normalise abuse, nor allow a culture where it is tolerated.

The College has a separate bullying, harassment, sexual harassment policy and also a harmful sexual behaviour (peer on peer sexual abuse) policy. These policies and procedures follow the guidance set out in Part 5 of Keeping Children Safe in Education 2023. As stated in the guidance cited above the College adheres to the advice of agencies including the Police and Social Care where allegations of a criminal nature are received.

The College's challenge of this behaviour may also include the use of the Student Disciplinary Policy.

e) Upskirting

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

f) Mental Health

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students and apprentices regularly and identify students or apprentices who may benefit from support from the College's internal support teams or external support.

Our staff are aware that mental health problems can, in some cases, be an indicator that a student or apprentice has suffered or is at risk of suffering abuse, neglect or exploitation. We understand that, where students and apprentices have suffered abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Where we have concerns, this may impact on mental health, we will seek advice and work with other agencies as appropriate to support a child and ensure they receive the help they need.

Positive mental health is the concern of the whole community, and we recognise that colleges play a key part in this. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter- balance and promote further growth of resilience.

g) Online Safety

With young people spending a considerable amount of leisure time online and Colleges moving to working more online, it is essential that we work together with students and apprentices, parents/carers, and external agencies to safeguard young people from potentially harmful and inappropriate online material.

The College recognise that students and apprentices live in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. Any student or apprentice can be vulnerable online, and their vulnerability can fluctuate depending on their age, developmental stage, and personal circumstance.

The range of online risks could be categorised as:

content: being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, suicide, racist or radical and extremist views

contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying

commerce: risks such as online gambling, inappropriate advertising, phishing and / or financial scams

The College have systems in place to filter and block internet access to harmful sites and inappropriate content. These systems are monitored and regularly reviewed to ensure that they are effective, and staff have all undertaken online safety training and are aware of their role within online safety and monitoring. Staff are aware that any concerns about online safety must be reported to the Safeguarding team.

The College has a separate student safety and ILT acceptable use agreement which sets out the College's processes and mechanisms to keep our students and apprentices as safe as possible in the online world at college and in life outside of college.

h) Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling, or coercive behaviour, sexual and/or economic abuse. The College recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on students and apprentices. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a student, apprentice or family or be placing a child or adult at risk of harm.

i) Serious violence

All staff should be aware of signs and indicators, which may signal that a student or apprentice is at risk from or are involved with serious violent crime. This may include:

- Increased unexplained, unverified (via parents/carers) absence
- Change in friendships or relationships with older individuals or groups
- Decline in College progress
- Unexplained injuries
- Unexplained gifts or new possessions

The above could indicate that the student or apprentice has been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk from criminal exploitation.

Staff should be aware of the range of risk factors which increase the likelihood in serious violence, such as being male, having frequent absence, having experience child maltreatment and having been involved in offending, however it must be noted that the risk factors above are not exhaustive.

j) Students and apprentices missing College

The College recognises that for some children, young people and adults at risk, absence from College may be a potential indicator for abuse or neglect and increase their risk of radicalisation, exploitation, and harm.

The College's attendance policy and procedures details that students and apprentices should notify the College of absence (whatever reason, in advance of the absence or on the day) by telling their tutor or Progress and Destination Tutor (PDT) they will be absent or by reporting their absence on the absence reporting form, available on the College's website.

If the student or apprentice has failed to notify the College about the absence, either through direct communication with tutor(s) or via the absence reporting button on the website, the tutor or PDT should phone them to establish their whereabouts.

The College requests two parent/guardian/ NOK contact numbers for each student and apprentice.

If no contact can be made then the absence should be notified to the Course Leader on the same day, so that follow up can be made and the parent/guardian, where age appropriate, is contacted.

If the tutor or PDT is concerned for the absent student or apprentice's welfare or feels that they are vulnerable they will refer this concern to a Safeguarding Officer, who will seek the advice of Adult/ Children's Social Care and/or the Police.

k) Looked after children missing college

The College engages with Welfare Call which is commissioned by the Local Authority (Essex County Council) to collect attendance information relating to Essex Looked After Children.

Further Information on specific Safeguarding Concerns can be found on page 141 of Keeping Children Safe in Education 2023

13. Managing Safeguarding Disclosures: The 5 Rs of Safeguarding – For All Staff.

Colchester Institute uses the 5 Rs of Safeguarding. The 5 Rs are introduced to staff within the initial Safeguarding training delivered during staff induction.

- Recognise – Ability to recognise behaviour which may indicate abuse or concern
- Respond – Promptly, appropriately, and sensitively to the student and the situation
- Report – Report concerns to a Safeguarding Officer
- Record –
 - Record precisely and promptly what has been alleged, ensuring details are accurate & factual,
 - Do not ask questions and do not investigate
 - Do not record yours or others' opinions as your report may be used as legal evidence
 - Give notes to the Safeguarding Officer
- Refer - The Safeguarding Officer will decide if referral is appropriate and to which agency referral is made

14. Procedures for reporting concerns – All Staff

Allegations or concerns of harm or abuse against students or apprentices.

Staff may become aware of possible concerns or actual harm or abuse either by observation of behaviour or through direct disclosure by the individual themselves or a third party for example a friend or family member.

If a student or apprentice starts to be abused, their behaviour may change; a calm person may become loud and disruptive; a lively person may become quiet and withdrawn. Students and apprentices may:

- present with bruises and injuries that they have difficulty explaining or that are in places where it is difficult to sustain injury accidentally e.g., neck, cheeks, eyes, shoulders and top of the arms;
- be scared, tearful and may present unusual, difficult, or strange behaviour;
- self-harm or place themselves in risky situations;
- attempt suicide

The staff member who receives the concern/has concerns must not investigate but it may be necessary to ask straightforward, non-leading questions of students and apprentices. If staff take brief factual notes, they can be written on a SGC1 Form (Appendix 1) or plain paper and passed onto a Safeguarding Officer within the relevant time frames. If making a written record it should state date, time, people present as well as what was said. If injuries are present and require treatment first aid should be called and injuries should be recorded on a skin map (available from the Safeguarding Team). Referrals can also be made to Safeguarding by telephoning 01206 712828 (operational College hours and term time only). If the student or apprentice is at immediate risk of harm a referral must be made immediately in person by accompanying the student to the Safeguarding Team.

Referral to a Safeguarding Officer – what happens next?

Once the Safeguarding Officer receives the details of the concern from the member of staff/student/apprentice/third party or has met the student/apprentice and undertaken preliminary enquiries including the nature of the concern the Safeguarding Officer will make a decision about action or referrals to safeguard the student from harm. This may be a direct referral to Essex County Council Social Care by telephone. The referral may need to be followed up in with an Essex Social Care Request for Support Form – available online only (for children) or SET SAF 1 (Adults), a report/referral to the Police, accessing emergency services (Ambulance) or other relevant agencies. If a Safeguarding Officer requires guidance on which agency is best placed to support and safeguard the student or apprentice, they will seek guidance from Essex County Council Children and Families Consultation Line (Essex Children's Social Care), Children's Social Care, Adult Social Care, CAMHS Single Point of Access, Adult Mental Health, health services or the Police.

In the case of a student still on school roll, the Safeguarding Officer, or a delegated member of staff from the New Approach curriculum area will inform the Designated Safeguarding Lead at the relevant school so that the school Designated Safeguarding Lead can make the informed decision regarding referral.

A record of concerns about students and apprentices must be kept even where there is no need to refer the matter immediately.

All records of concern reported to the Safeguarding Team are recorded on a secure online system. Any paper notes and documentation relating to safeguarding and child protection are kept in a locked cabinet and not in the student or apprentice's educational file.

Appendix 2 displays a flow chart for staff referrals to a Safeguarding Officer. Appendix 3 is a flow chart followed by the Safeguarding Officers.

15. Confidentiality

Staff must never give an undertaking of absolute confidentiality. If staff do give an undertaking of absolute confidentiality, this could be regarded as an act of misconduct which would be addressed under the College's disciplinary procedure.

The College has a professional responsibility to share relevant information about the protection of students and apprentices with other professionals, particularly investigative agencies such as Essex County Council Social Care, the Designated Safeguarding Lead at the relevant school (if appropriate) and the Police (if appropriate). If a student or apprentice confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells them that he or she has a responsibility to refer safeguarding and child protection concerns to the appropriate agencies for the student or apprentice's sake. Within that context, the student or apprentice should, however, be assured that the matter will be disclosed only to people who need to know about it. Staff who receive information about students, apprentices, and their families in the course of their work should share that information only within appropriate professional contexts.

16. Information Sharing

Where possible, consent to share information with agencies and internal staff should be sought from the student or apprentice and recorded. However, GDPR and the Data Protection Act 2018 are not barriers to sharing information for the purposes of keeping children, young people, and adults at risk safe.

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers July 2018 states.

"Information which is relevant to safeguarding will often be data which is considered 'special category data'.

"Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes "safeguarding of children and individuals at risk" as a condition that allows practitioners to share information without consent".

Sharing Safeguarding information with parents, carers, next of kin

Where the College has a Safeguarding concern about a student or apprentice under the age of 18 years of age, or under 25 years if they are an adult at risk, parents or next of kin will be informed of the concern about the student or apprentice so they can work together to support the student or apprentice. The College will not contact parents or next of kin if informing them would place the student or apprentice at risk of harm.

In some cases, the College will be told by Social Care or the Police that the sharing of information with the student or apprentice, parents/carers/next of kin, staff, other students involved is prohibited. The College will adhere to Police and Social Care instruction.

Parents/carers/next of kin are encouraged to seek and engage with support for the student or apprentice outside of college in addition to the support the College can offer. This is vital to safeguard the student or apprentice both inside and outside of college.

Staff will never guarantee confidentiality to anyone (including parents/carers or pupils) about a safeguarding concern, nor promise to keep a secret.

Life Threatening Situations/concerns for welfare

In situations where a student or apprentice's life is at risk (suicide plans/attempts/threats of violence/harm against them/others) or there is concern for the welfare and or safety of a student, information will be shared with the emergency services, Social Care (where appropriate) and the students/apprentices named parent/carer/next of kin, (unless this would place the student or apprentice at risk) regardless of their age.

The College is committed to preserving life.

Sharing Safeguarding information with internal staff

Sharing information with staff internal to Colchester Institute will be assessed by the Safeguarding Officer on a case-by-case basis. Safeguarding Officers will always ask for consent from the student or apprentice to share safeguarding information with internal staff. Where consent is not given but there is a need for a tutor/support member of staff to know to support the protection of the student or apprentice, information will be shared. The student or apprentice will be informed of this and advised with whom the information will be shared and why.

For example: a student or apprentice who self-harms may be using sharp objects (in a kitchen or art environment) for the purposes of their studies. Extra vigilance would be required by staff directly involved in the teaching and support of the student or apprentice, in order to safeguard the student. In this instance we would need to share information with the course team to safeguard the student or apprentice.

Situations where students and apprentices need no additional protection, for example: historic concerns and there is no need for staff directly involved in the teaching and support of the student to know about the safeguarding concern, the staff will not be told unless the student or apprentice consents to sharing the information.

Staff members should respect the privacy, wishes and confidentiality of students and apprentices in relation to Safeguarding Officers sharing safeguarding concerns about the student. Staff should be confident that Safeguarding Officers will share if there is a need to share.

Safeguarding Officers will record information sharing decisions and reasons why in relation to cases when consent is not given.

17. Circumstances for referral to agencies by a non- Safeguarding Officer including out of hours

Safeguarding is everyone's responsibility. The role of Designated Safeguarding Lead, Deputy and Safeguarding Team of Safeguarding Officers exist to ensure a main point of contact, that Safeguarding procedures are followed consistently, records are made and kept and ensure that the safety of the student or apprentice is paramount.

In exceptional circumstances it may be necessary for staff to make a referral to external agencies (Social Care/Police/Mental Health). These exceptions may be:

If you have concerns about a student or apprentice:

- outside of college hours or
- if you are unable to contact a Safeguarding Officer/ Designated Safeguarding Lead/Deputy and have exhausted all internal Safeguarding Contacts or
- you have concerns that the DSL, DDSL and or Safeguarding Officer is not executing their role

If the student or apprentice is at immediate risk from harm, please dial 999. Please notify a Safeguarding Officer as soon as is reasonably possible.

If you do make a referral to Children's Social Care/Adult Social Care/ EWMHS/Police. Please ensure you notify a Safeguarding Officer as soon as is reasonably possible after the referral has been made.

To make referral you will need

- Student or apprentice's name, address, date of birth, family composition;
- other agencies involved with the student;
- reason for referral;
- name of person receiving the referral and any advice given;
- name and contact details of referral

Contact numbers for referrals including out of hours

If you are concerned that a child or adult at risk is at immediate risk of harm, please ring 999

- Essex Children's and Adult's Social Care out of hours – 0345 606 1212
- Essex Children's and Adult's Social Care 8.45 – 5.30pm Mon-Thu and Fri 8.45 – 4.30 0345 603 7627
- Child and Adolescent Mental Health Service up to 18 years of age – 0300 300 1600
- Mental Health referrals for 18 years plus can only be made by a Health Professional i.e.: GP

Police	Non-emergency	101
	Emergency	999
NHS	Non-emergency advice	111
	Emergency	999

18. The use of reasonable force/physical intervention in college

Keeping Children Safe in Education defines reasonable force as:

'There are circumstances when it is appropriate for staff in schools and colleges to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child 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 pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom

Staff must always seek to defuse situations with students verbally, where reasonable force is deemed necessary it is advised that two staff members are present, and the reasonable force must be used for the shortest period necessary.

In all cases where reasonable force is used it must:

- Be notified and documented to the relevant CLMG member within one working day of the incident – appendix 6 can be used to record reasonable force including details of the incident, witnesses, times, locations, method used. subsequent actions and aftercare for the student
- be subject to de-briefing for staff involved and lead to a review of strategies for managing behaviours of students.

19. Allegations or concerns against a member of staff, volunteer, governor, or contractor

These procedures apply to all College staff, whether they work in the main College campuses, outreach centres or other designated areas, as well as volunteers, governors, and contractors

The College will follow **Keeping Children Safe in Education Part 4: Allegations of Abuse made against Teachers and other Staff** as its guidance for dealing with such allegations and low-level concerns.

The College has a separate procedure for allegations of concerns made about staff, volunteers, contractors, and governors. This can be found in the HR section of the College portal or for non-College students/staff can be requested from the Human Resources department.

20. Relationships between Staff, Students and Apprentices

It is important that all staff at the College understand the level of professional conduct expected of them in respect of relationships with students and apprentices at all times.

Relationships with students or apprentices under the age of 18

Relationships between staff and students including apprentices under the age of 18 are strictly prohibited.

Colleges act *in loco parentis* for students under 18 and there should be a clear expectation that no member of staff, whether in a teaching or support role, should enter into a relationship with any student or apprentice under the age of 18.

Moreover, teaching staff in particular should be made aware that having a relationship with a student or apprentice under 18 could be treated as a criminal offence that may result in imprisonment.

The Sexual Offences Act 2003 contains provisions that specifically deal with offences against children and sections 16 - 24 of the Act deal with the abuse of a position of trust, including sexual activity with a child under the age of 18. The purpose of these provisions is to protect young people who are considered to be particularly vulnerable to exploitation by those who hold a position of trust or authority in their lives. In such cases, it is not relevant that the sexual activity was consensual, due to the particular relationship between the student or apprentice and the abuser. These offences are designed to protect 16- and 17-year-olds from being persuaded to engage in sexual activity, which would not be criminal except for the member of staff's position of trust in relation to the student or apprentice.

Positions of trust are defined in sections 21 and 22 of the Act and include looking after persons under 18 in an educational establishment, residential settings, where duties involve regular unsupervised contact with children in the community.

Staff entering into close personal relationships with students and apprentices under 18 and adults at risk will be subject to the College's disciplinary procedure. This behaviour is likely to constitute gross misconduct, which could lead to summary dismissal and a referral to the Disclosure and Barring Service.

Relationships with students and apprentices who are adults at risk

Relationships between staff and adult at risk students and apprentices are strictly prohibited.

This type of relationship could be viewed as an abuse of the staff member's position of trust and breach of the standards of professional conduct expected at Colchester Institute. Any member of staff who enters into such a relationship will be the subject of a disciplinary investigation in accordance with the college's disciplinary procedure.

This behaviour is likely to constitute gross misconduct, which could lead to summary dismissal and a referral to the Disclosure and Barring Service and could also potentially be a criminal offence under the Sexual Offences Act 2003. See section 5 for the definition of adults at risk.

Relationships with students and apprentices aged 18 or above who are not Adults at risk

Personal relationships between a staff member and a student or apprentice who is not under 18 years of age or an adult at risk, that are different to a normal and/or reasonable professional relationship are strongly discouraged by the College.

All students and apprentices are entitled to equality of treatment, and it is important that this is maintained and also perceived to be maintained. The College and its staff have a professional responsibility to protect the interests of all students and apprentices. Relationships between staff and students and apprentices are not generally equal, as staff members will clearly have a higher hierarchical status at the college than the student.

A relationship between a member of staff and a student or apprentice poses risks to both parties: the student or apprentice may become isolated from peers, particularly if other students or apprentices perceive there to be favourable treatment from the member of staff, which could affect the student's or apprentice's group work and general college experience. The member of staff may find relationships with colleagues strained, and may risk allegations of harassment from the student, particularly if the relationship were to break up.

However, it may be that a personal relationship already exists between a member of staff and a student or apprentice, or a relationship may develop between a member of staff and a student of 18 years or more who is not an adult at risk.

Declaration of a staff and student or staff and apprentice personal relationship

If a personal relationship exists prior to a student or apprentice being enrolled at the College, this must be declared to Human Resources.

Staff who embark on personal relationships with students or apprentices over the age of 18 who are not adults at risk, which are different to a normal and/or reasonable professional relationship, must disclose the relationship to Human Resources immediately. Human Resources will then:

- Inform the Line Manager and the College Executive member relevant to their role.
- Determine whether the student or apprentice is considered to be an adult at risk by checking with the Designated Safeguarding Lead to see whether this student could be considered as an adult at risk as defined in this policy. This check will be made in confidence by Deputy Chief Executive with responsibility for Human Resources or their Deputy.
- If the student or apprentice is deemed to be an adult at risk, as defined in this policy, disciplinary procedures will be initiated for the member of staff.
- If the student or apprentice is not deemed to be an adult at risk, the staff member will be informed that safeguards need to be put in place in order to protect both the staff member and the student or apprentice professionally. If the staff member has a direct professional relationship with the student or apprentice or any influence on the student or apprentice at college, the college will put in place appropriate arrangements to ensure that the student or apprentice's learning and assessment procedures are free of bias.
- The College will also advise the member of staff and the student or apprentice that their personal relationship should be conducted entirely off campus. This is to avoid negative perceptions from other members of staff, students, and apprentices.
- There is a possibility that due to the personal relationship, the student or apprentice may be in a position to gain greater knowledge from the staff member. The line manager / Area Head/Head of School should consider this possibility when ensuring that the student or apprentice's assessments are free from bias.
- Although the Area Head or Head of School will treat the disclosure sensitively and in confidence, it is likely that other members of staff will need to be informed. This will be on a strictly need-to-know basis, and this will be discussed with the member of staff first. Examples of when the disclosure might need to be shared, in confidence, include advising those assessing the student or apprentice's work, which may include external verifiers or moderators. This may be necessary in order to maintain the integrity of the assessment process.

Failure to disclose a personal relationship at the earliest opportunity for the staff member with any student or apprentice will be dealt with under the College's disciplinary procedure and is likely to constitute gross misconduct.

Failure to disclose conflicts of interest in any meeting requiring such disclosure of staff members where they are in a relationship with any student or apprentice will be dealt with under the College's disciplinary procedure and is likely to constitute gross misconduct.

If a student or apprentice declares a relationship with a member of staff, the college will follow the same procedure above.

It would be completely unacceptable for a member of staff to form a relationship with a student or apprentice based on preferential treatment in return for sexual favours. Any such behaviour will be subject to the College's disciplinary procedures, under gross misconduct and a referral will be made to the Police.

21. Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. This can be done via the College's Whistle Blowing Policy available from the Human Resources section of the Portal or by contacting Human Resources and requesting the Policy.

Where a staff member feels unable to raise an issue with their employer via the College's whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at - <https://www.gov.uk/whistleblowing>
 - The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Alternatively if a staff member has a concern related to an adult working with children and does not wish to raise the concern via the College's Safeguarding they can contact the Essex Local Area Designated Officer (LADO) by e-mail: lado@essex.gov.uk (Please note this is not a secure address so any information sent must be password protected).

22. Students on alternative year 11 programmes

The College has a duty of care towards students who are studying on the alternative year 11 programmes whilst on college premises. In arranging provision for students of compulsory school age, the College will;

- Monitor attendance – daily phone call to NOK is made when a student does not attend with overall attendance summarised in a weekly report that is shared with both the NOK and school/Education provider. This also includes a brief weekly progress report shared with NOK and schools
- Maintain regular contact with a named staff member from the schools or education providers/Local Authority in relation to the student's progress, wellbeing and or concerns
- Provide schools or education providers/Local Authority with relevant details of provision and setting to enable the schools or education providers/Local Authority to obtain parental consent (or, where appropriate, consent from a guardian or foster parent) for their child to participate in the programme, knowing that the child is on a mixed age campus and not in a separate space. The College will require evidence of this written consent;
- Obtain parental consent via the referring school, education provider/Local Authority that the child can leave campus unsupervised at break times and lunch times;
- Request details from the school or education provider/ Local Authority prior to admission of any safeguarding, medical, behavioural, special educational needs or disability requirements including EHCPs that a student may have and agree with the school how the support can be provided;
- Ensure that students are made aware of the general standards of safety with which they must comply.

- Gain and record written permission from students' NOK for students to go off site at lunch/break times and keep on file
- Ensure students on this programme wear an orange lanyard whilst at CI to identify them as 15 or 16 years old – Year 11.
- Hold regular 1:1 tutorials undertaken with students with Education and Pastoral Support Officer
- Hold the majority of timetabled sessions in 'base room' close to the staff office
- Deliver Safeguarding/keeping safe and healthy topics in the tutorial programme
- Undertake a face-to-face comprehensive admission/interview procedure to assess a young person's suitability to the New Approach programme. Referral to the program is made by Education Provider and requires comprehensive overview of a young person's background and barriers to learning. An interview with the core team is undertaken also as part of the referral process.

All concerns regarding safeguarding for students on the alternative year 11 programs must be referred, by the College for action, to the Child Protection Officer at the school or education provider where the student is on roll (or the child's social worker if the student is not on a school roll) and then centrally recorded with the College's Safeguarding Team. Colchester Institute will act in the best interest of the student in order to secure their immediate safety.

23. Student Work Experience, Work Placements, and Industry Placements

The College uses Health and Safety guidance from the [DfE](#) and [HSE](#) for work experience work placements and industry placements.

Staff who arrange and monitor work experience, work placements, industry placements and apprenticeships must have undertaken the College safeguarding training.

Employers – hosting work placement, work experience and or industry placements will be checked through the DfE guidance to ensure that the locations and environments in which students will be completing their work experience, industry placement are appropriate, and that the employer has sufficient Health and Safety policies in place.

Our safeguarding policy guidelines are given to businesses where they don't already have a safeguarding policy in place.

All apprentice employers will be monitored as part of the initial sign-up process and the 12 weekly review process.

The HSE is clear in its advice that the management of health & safety for placements rests with the employer and should not be a barrier. Their advice states that 'there are very few work activities a student cannot do due to health and safety law'.

The College need to:

- take reasonable steps to satisfy ourselves that the employer is managing any significant risks
- rely on past experience with the employer where no significant change has taken place
- work with parents to ensure employers know in advance about students who might be at greater risk
- keep checks in proportion to the environment
- check that the employer understands about the specific factors relevant to employing young people
- check that students and apprentices know how to raise any health and safety concerns
- Ensure that factors relating to individual students or apprentices are taken into consideration where necessary (medical conditions, allergies, support needs, etc.)

Sole Traders

We are defining a Sole Trader as a person who normally conducts their business on their own and works on a Self-Employed basis by arrangement or under contract to others. All Sole Traders must be given a copy of the Safeguarding Guidance for Sole Traders.

Work Experience (GAP) placements can be completed with sole traders, either where the learner is already employed by the sole trader or where it is a new employer and the College have obtained informed consent from the parent/guardian.

Prior to commencing work experience with a sole trader, the parents/carers of a student who is under the age of 18 years is asked to read and sign a special consent form for their child to commence work experience with the sole trader. The consent form gives information about possible additional risks of working with a sole trader.

Please Note: All students on work placement count as employees under Health and Safety Law and should be covered by Health and Safety Law and Employment Law and the Employer's Liability Insurance. Employers Liability Insurance is normally required unless they are a very close family member.

Students must not enter into an arrangement where they accept nominal 'Self Employed' status for themselves to 'help an employer out'.

This is not acceptable, and the College will not place a student under those circumstances as the College must ensure they are protected as employees under law.

Work Placements

Students over 16 years whose course work placement includes unsupervised access to children and young people will be required to have a clear enhanced DBS check. If the student will be working with children under 8 years old, they will also need to complete a Childcare Disqualification Regulation form 2009.

The DfE guidance referenced in the above section issued when working with employers to ensure that the locations and environments in which students will be completing their work placements are appropriate, and that the employer has sufficient Health and Safety policies in place.

When a workplace check suggests that an employer does not have appropriate safeguarding and child protection policies or awareness of safeguarding and child protection issues or is unwilling to subscribe to the principles of Colchester Institute's Safeguarding and Child Protection policy or where there is evidence of risks to child safety, tutors will be instructed to ensure that no learners are placed with that employer.

The College will ensure that:

- Work Experience paperwork is checked by a tutor or course leader;
- Industrial Placements Workplace checklist will be checked by the relevant workplace co-ordinator;
- Apprentice placements paperwork is checked by the Assessors.
- This policy is available online for all Colchester Institute staff involved in placements to refer to and should be used in addition to the Safeguarding Guidance for Sole Traders and the Safeguarding Guidance for Online Home Working.

Through the guidance notes for students on placements, students who are placed with employers will be given clear advice about whom to report concerns in relation to Health, Safety or Safeguarding.

If a student is concerned for their safety whilst on work experience or industry placement, they should call the College Safeguarding Team on 01206 712828 (this is not a 24-hour line, calls will be answered Mon-Thurs 8.30-5.00pm and Fri 8.30 – 4.30pm College Term Time Only). If a student is at immediate risk of harm at any time, please phone the emergency services on 999.

24. Records

The Designated Safeguarding Lead will be responsible for maintaining records, in a secure place, of all child protection and safeguarding referrals.

Documents relating to allegations, concerns, low level concerns, investigations or action taken in relation to staff, volunteers, contractors, governors or any staff disciplinary action and records will be kept by Human Resources in accordance with Human Resources procedures.

25. Awareness of Safeguarding – Students, Apprentices and Parents

Students on Study programmes will be made aware of safeguarding and potential safeguarding issues, how to keep themselves safe and what to do if they have concerns through: student induction, student services video, cross college awareness events, guest speakers, workshops, their college ID card, posters around College, College Portal and in the course of studying at the College.

Students enrolled on a study programme will explore safeguarding topics within their timetabled group tutorial lessons. The group tutorial scheme of work includes mandatory safeguarding sessions which are delivered, this forms part of the College's CREW curriculum (Career Readiness, Enrichment and Wellbeing) aimed at raising awareness and equipping students to make good choices, keep themselves and other safe and make a positive difference to their own life experiences. Topics explored include: Prevent and radicalisation, Diversity, Equity and Inclusion, Risky Behaviours, Healthy Relationships including sexual harassment and harmful sexual behaviour, online safety.

Apprentices will be made aware of potential safeguarding issues (including exploitation, online- safety, bullying, radicalisation), how to keep themselves safe and what to do if they have concerns through: induction, student services video, assessor visits, cross college awareness events, guest speakers, workshops, their college ID card, posters around College, College Portal and in the course of studying at the College.

Students and apprentices can access advice and information on welfare and safeguarding issues whilst enrolled by contacting the welfare and safeguarding team either by email, phone or in person. Contact details for the safeguarding team are available and communicated as detailed in section 26.

The College will ensure that parents and stakeholders are aware of the College's commitment to Safeguarding and Child Protection by including its commitment to this in corporate publications included on the College website.

Appendix 7 lists links to advice and information on Safeguarding and Child Protection issues.

26. Recruitment of Staff and Volunteers

The College will implement procedures to ensure that all appropriate checks are carried out on all staff working at the College. This will be documented in a Single Central Record as set out in Keeping Children Safe in Education guidance. Enhanced DBS disclosures will be obtained, and the barred list checked for all staff appointed to positions where the person will be engaging in regulated activity with children and adult at risk. The College has a separate Recruitment and Selection Policy and Procedure and Vetting Checks and Single Central Register Policy.

Volunteers to the College where regulated activity will be taking place will also require an Enhanced DBS check and the barred list checked.

27. Staff Training and Support

The College will provide safeguarding training for all staff working with students. The training will;

- help staff to recognise the signs of possible harm to students and apprentices.
- ensure that staff know how to proceed when possible harm is suspected and whom to contact;
- inform staff of college procedures and policies in the area, relevant legislation and the role of the designated members of staff for child protection.

Safeguarding training is included within the Induction programme for all new staff.

All College Governors undertake Safeguarding Training.

Safeguarding refresher training for all staff is required at least every 3 years. Failure to complete this refresher training could be deemed an act of misconduct and if so, would initiate actions under the College's disciplinary procedure.

Safeguarding and Child Protection updates relevant to all staff will be shared when they arise. An annual Safeguarding information update will be communicated to all staff.

Support is available for members of staff who have received disclosures. In many cases, this can be a painful and disturbing experience for the recipient, who may in some cases require counselling support. Staff Counselling can be arranged via the Employee Assistance Programme.

Informal support can be sought from Safeguarding Officers however it must be made clear that the support is informal and that they are not drawn into a pseudo-counselling relationship with the staff member who received the disclosure.

Safeguarding Officers will receive monthly supervision with an external supervisor to ensure their emotional wellbeing is supported. Peer support from other Safeguarding Officers, the Designated Safeguarding Lead and their deputies is available daily as and when required either as a way of escalating concerns, talking through options, or sharing difficult cases. Safeguarding Officers can also access Staff Counselling via the Employee Assistance Programme.

28. Communication of this Policy and Safeguarding Officers' Contact Details

Staff, students and apprentices, volunteers and visitors will be made aware of the College Safeguarding Policy, Safeguarding Officers, and where and how to seek help through the following communication channels: -

- Portal and email
- Induction procedures for new staff, students, and apprentices
- Apprentices – Assessor visits
- Apprenticeships – employer Safeguarding document
- Prospectus
- ID cards
- Fold out Z card for Part time students and visitors
- Posters listing Safeguarding Officer Contact number
- Publication on the College Portal of helpful information accessible to students and apprentices e.g., Childline, NSPCC
- Promotion of support provided through Student Services.
- From staff, assessors, and employers

29. Reports to the governing body

The Designated Safeguarding Lead (DSL) will report to the Corporation Board on safeguarding, systems, and statistics. These will include any changes to the policy, training undertaken and numbers of child protection and safeguarding incidents.

In addition, the child protection/safeguarding incidents will be reported to each Curriculum and Quality Committee (or as they occur if there is nothing to report). Such reports will be made with due regard to confidentiality i.e., names will not be included.

30. Monitoring and Review

This policy will be reviewed annually.

31. Associated Policies and Documents

This policy should not be read in isolation and should be cross-referenced with all relevant College policies, procedures and guidelines including: -

- Safeguarding Protocol for Staff
- Staff Code of Conduct
- Dealing with safeguarding concerns about staff, volunteers, contractors, and governors
- Staff Disciplinary Policy
- Student Criminal Conviction and Pending Prosecution Policy
- Diversity, Equity, and Inclusion Policy
- Safeguarding Guidelines for Sole Traders
- Guidelines for online home working
- Student E-Safety policy and ILT Code of Conduct
- Staff Induction procedures
- Staff and student bullying/harassment procedures
- Student disciplinary Policy
- Student attendance Policy
- Prevent Strategy
- Health & Safety Policy
- First Aid Policy
- Work experience for Study Programmes policy
- Recruitment and Selection Policy and Procedure
- Vetting Checks and Single Central Register Policy
- Student Emotional Wellbeing Statement
- Student Bullying, Harassment and Sexual Harassment Policy
- Harmful Sexual Behaviours –
- Peer on Peer Sexual Abuse
- Student Fitness to Study Policy
- UCC Fitness to Study Policy

APPENDIX 1

Safeguarding Concerns 1 Record Form

Colchester Institute

This form can be used by the staff member to record and refer a concern or if they have received a disclosure of concern from a student/third party.

When should I complete this form?

This form should be completed when you have a Safeguarding Concern about a student or have received a disclosure and the student is **not** at risk from immediate harm.

This form must be submitted to Safeguarding **within one working** day of the disclosure/concern.

Submitting the form

Please bring this form to Student Services: Safeguarding (Colchester and Braintree) or email to sswelfare@colchester.ac.uk. Please password protect the document.

Safeguarding Team Locations Colchester and Braintree Ground Floor B Block (Colchester), Student Services – Student Hub (Braintree).

If the student is at immediate risk from harm, please bring the student down with you to Student Services: Safeguarding immediately (Colchester and Braintree) Once the Safeguarding Officer is handling the case and the student is safe you may be asked to complete this form.

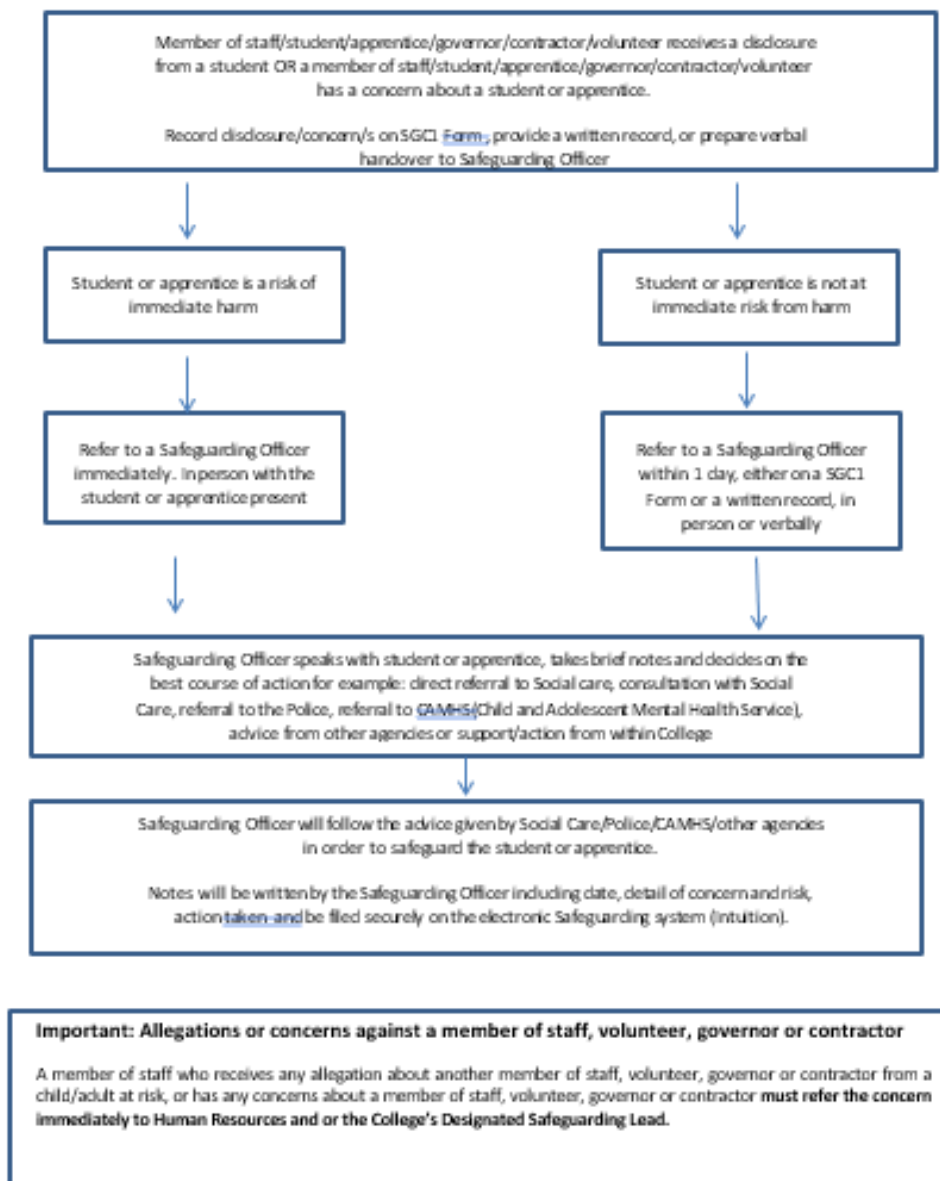
By phone Safeguarding can be contacted on ext. 2828 8.30am – 5pm Monday – Thursday and 8.30am – 4.30pm Friday. Term Time Only. Out of hours, if the student is at risk, please call the emergency services on 999.

Details of Concern/Disclosure

Date	
Time	
Name of student/s	
Student Number	
Student D.o.B.	
Student Age	
Student Course	
Staff Member Name:	
Details of concern/disclosure: (Please attach extra sheets if required) Record the following factually using the learner's words: Who? What? Where? When (date and time of any incident/s), Any witnesses?	
What has been done to ensure the immediate safety of the student?	
Signature of Staff Member:	

APPENDIX 2

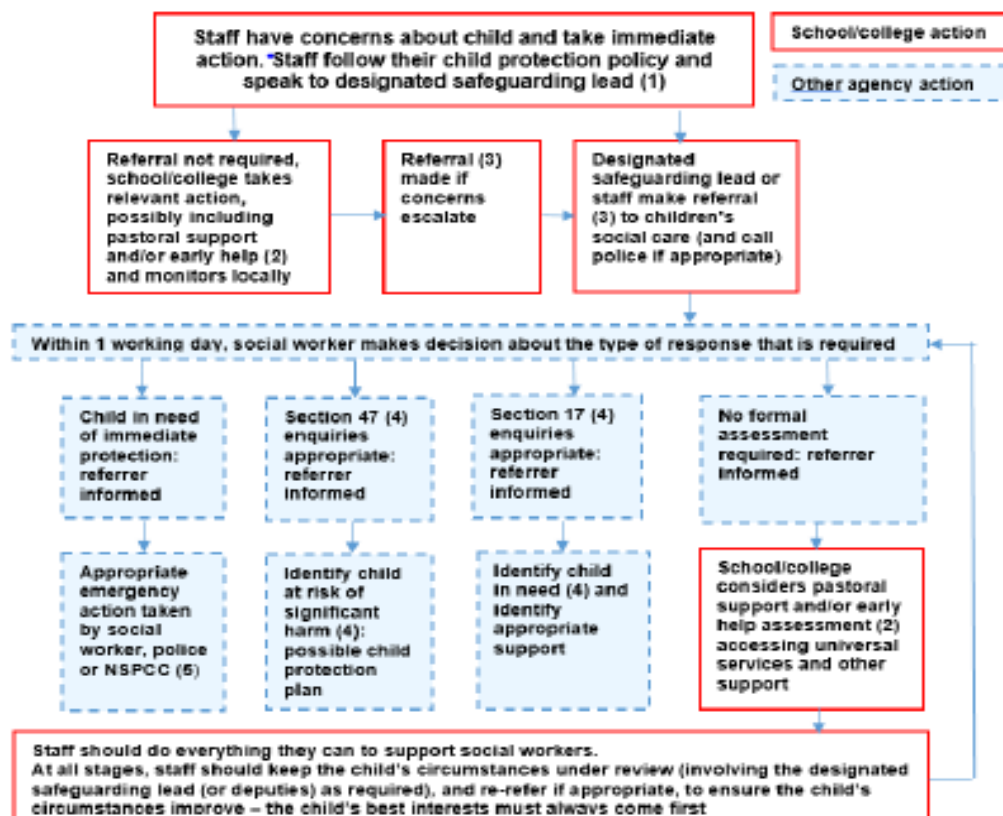
Flow Chart - Staff referral to a Safeguarding Officer



APPENDIX 3

Flow Chart followed by Safeguarding Officers – Concern about a child Taken from Keeping Children Safe in Education 2023

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) 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](#) provides detailed guidance on the early help process.

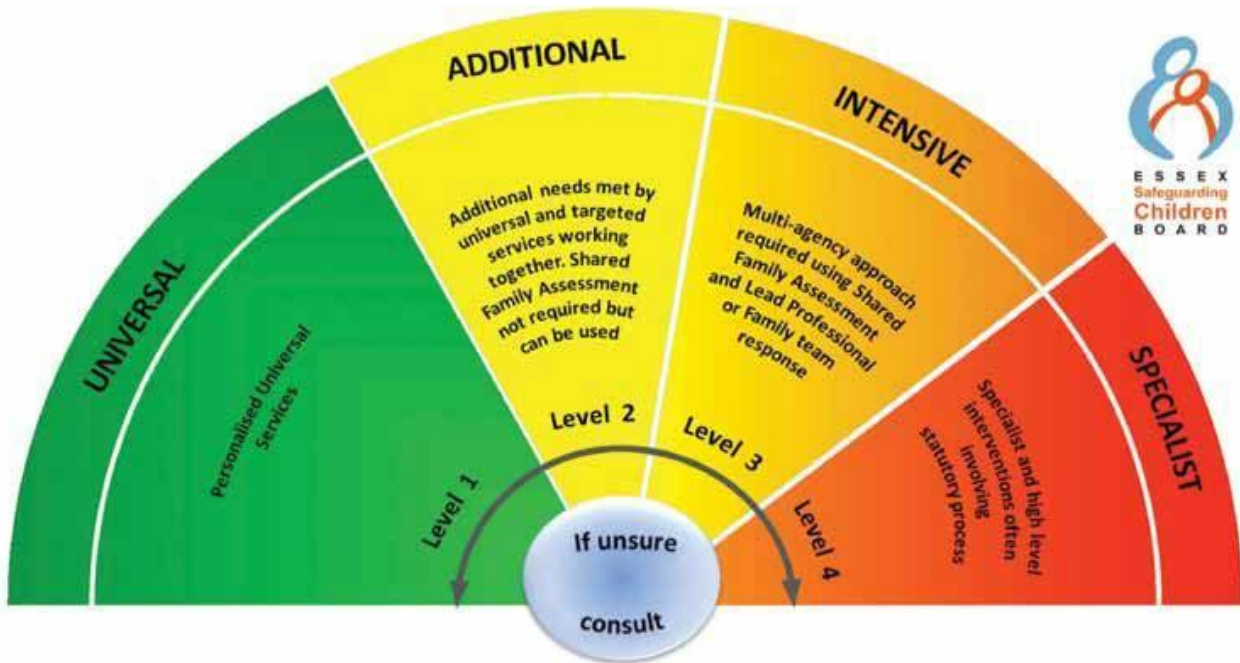
(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

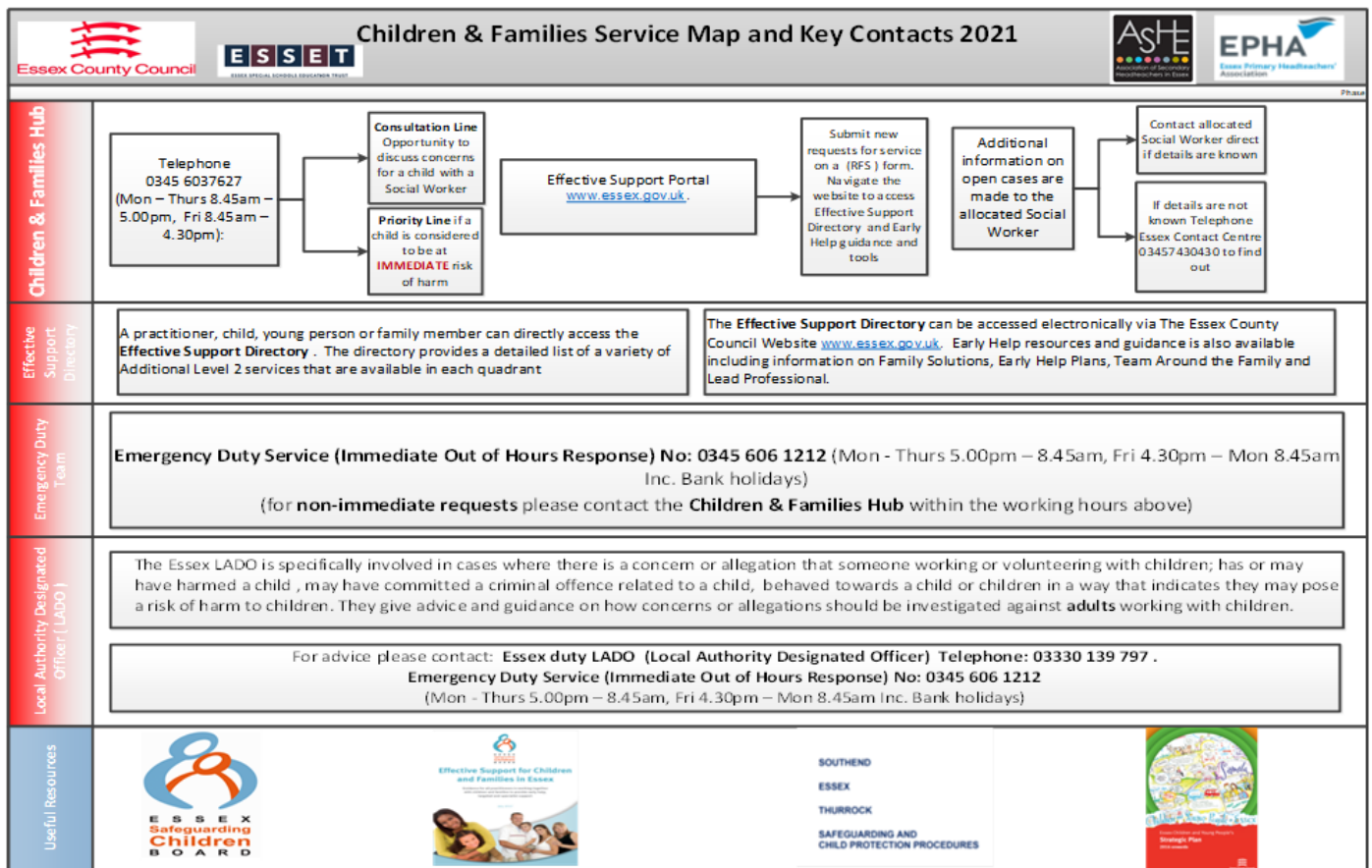
(5) This could include applying for an Emergency Protection Order (EPO).

APPENDIX 4

Children and Families Windscreen of need



APPENDIX 5



APPENDIX 6

Reasonable Force/Physical Intervention Record Form

To be completed by staff and returned to their CLMG Manager within one working day of Reasonable Force/Physical Intervention being used.

Date of intervention:	
Time of intervention:	
Staff Name:	
Student/s Name:	
Location of intervention: i.e.: room number, stairwell	
Description of situation leading to physical intervention:	
Approximate Duration of PI	
Description of physical intervention use: i.e.: placing your body between two students, leading by the arm etc.	
Name/s of staff witness:	
Name/s of student witnesses:	

Aftercare for Student:	
Aftercare for Staff/witnesses:	
Outcome:	
Name of Line Manager/Senior Person who you have verbally informed that PI was used:	
Further information:	
Signature of staff member:	Date:

APPENDIX 7

Current Safeguarding Officers

If calling from outside the College, the phone numbers for Colchester will be 01206 71.... Followed by the extension number, for the Braintree Safeguarding Officer it will be 01206 **814194**

Safeguarding Officers: Colchester - Ground Floor B Block

Dawn Swainson	Student Services Welfare and Safeguarding	Ext. 2354
Hayley Burkhill	Student Services Welfare and Safeguarding	Ext. 2132
Jess Purtell	Student Services Welfare and Safeguarding	Ext. 2383
Jackie Brooks	Student Services Welfare and Safeguarding	Ext. 2293
Gina Page	Student Services Welfare and Safeguarding	Ext. 2885

Safeguarding Officer: Braintree – The Student Hub.

Julie Ferneyhough	Student Services Welfare and Safeguarding	Ext. 4194
-------------------	---	-----------

If you are unable to reach a Safeguarding Officer on the extensions above, please do not leave a voicemail (unless non-urgent), please phone the Safeguarding line on Ext. 2828 (01206 712828) or pop down to see the team

This number is operational Mon-Thurs 8.30am – 5.00pm and Friday 8.30am – 4.30pm
Term Time only