College Group Policy

Safeguarding

Manager Responsible: Director of Learner Development & Inclusion

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Staff:	☒	Governors:	☒
Students:	☒	External:	☒

Chelmsford College

Lee Stafford hair & beauty

Dovedale Nursery

AMENDMENT SUMMARY

Version	Date	Remarks
6.0	15 Sep 2016	Annual review and removal of references to CTS. Addition of Appendix relating to visiting speakers.
6.1	17 Mar 2017	Addition of recording process for Dovedale Nursery. Provided explicit guidance for management of visitors & training for volunteers. Update to Associated Policies List. Inclusion of references to Statutory Guidance on FGM.

Age, Disability, Gender & Race Equality Statement

Age, Disability, Gender and Race Equality Impact Measures will be set and monitored through analysis of all data related to potential suspected or actual abuse of this policy.

A copy of the Equality Impact Assessment Initial Screening Form is attached as an Annex to the full Safeguarding Policy

Policy Summary

1. INTRODUCTION AND PURPOSE

As well as needing to provide a safe and secure environment under UK law, the College Group is committed to helping learners achieve their best by making sure they feel comfortable and safe in all College Group locations. The Safeguarding Policy tells everyone how this is going to be achieved. It also gives certain people responsibilities and tasks to make sure it happens. The Policy applies to all staff, learners, volunteers and regular visitors.

The College Group will do everything it can to protect young people from:

- Abuse
- Harassment
- Child Sexual Exploitation
- Forced marriage or honour-based violence
- Harm from cultural or religious practices; including Female Genital Mutilation (FGM)
- Radicalisation

It is hoped that learners and parents or carers will feel free to discuss any concerns they have which may affect successful learning and will view the College as a safe place if there are any difficulties elsewhere in their lives.

2. DEFINITION

The Department for Education document '*Keeping Children Safe in Education'* defines Safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- And taking action to enable children to have the best outcomes.

This means all the activities shown below must include some consideration of Safeguarding matters:

The Children Acts 1989 and 2004 state that a child is any person aged under 18. However, in certain circumstances this age limit may be extended; for example, in the case of a person with learning difficulties or in cases where there has been an abuse of trust.

Although the College Safeguarding Policy is generally applicable to those who must be protected, the principles apply to any concerns around the welfare of learners.

3. MAIN PRINCIPLES

The College Group promotes an ethos where young people feel secure, are encouraged to talk and are listened to. Due to the duty to protect learners from harm, when concerns are raised we will not make promises we cannot keep and we will not keep secrets. Every learner will normally be told by the member of staff they have chosen to talk to, what will happen next.

Staff who observe any behaviour or who hear or are told anything significant by a learner or others, must report their concerns in accordance with the diagram on Page 5.

Safeguarding issues can revolve around one or more of the following; detailed definitions can be found elsewhere in this document:

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Bullying or harassment (including e-safety)
- Forced Marriage
- Radicalisation

The College Group recognises the positive contribution it can make towards protecting its learners from radicalisation towards violent extremism. Through Learner Voice and the tutorial programme, it will continue to help the learners to create communities that are resilient to extremism and protect the wellbeing of particular learners who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The Female Genital Mutilation Act 2003[1] creates a mandatory reporting duty requiring specified regulated professionals[2] in England and Wales to make a report to the police. The duty applies where, in the course of their professional duties, a professional discovers that FGM appears to have been carried out on a girl aged under 18 (at the time of the discovery).

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If anyone has any significant concerns about a learner beginning to support terrorism and/or violent extremism, they should discuss the individual with the Director of Learner Development & Inclusion.

Staff cannot guarantee to consult parents or carers first, or to keep a young person's concerns confidential, if a referral must be made to the appropriate agencies (Police or Local Authority) in order to safeguard the young person's welfare.

The Social Services and Police have the primary responsibility in the field of child protection and preventing violent extremism respectively. Local authorities must take steps to protect people at risk in appropriate circumstances and give certain powers to the police so that they can take action to protect them.

It is not the College Group's responsibility to investigate abuse. Nevertheless, it must act if there is cause for concern and must notify the appropriate agencies so that they can investigate and take the necessary action.

All staff who are in regular contact with young people will need to attend basic safeguarding training. The College Group will provide adequate training and supervision to ensure that the needs and welfare of young people are paramount. When staff join the College Group they will be trained in the Safeguarding arrangements as part of their induction. Mechanisms are in place to assist them to understand their role in safeguarding young people and vulnerable adults. Regular updates on Safeguarding matters will be provided to all staff.

[1] Section 5B(11) of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
[2] Including 'Teachers' - in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

4. STAFF WITH SPECIFIC SAFEGUARDING RESPONSIBILITIES

The staff listed below have specific responsibilities detailed in the full Policy document:

- Designated Governor
- Director of Learner Development & Inclusion *(Designated Senior Safeguarding Manager)*
- Directors of Curriculum *(Deputy Senior Safeguarding Managers)*
- Curriculum Area Managers
- Manager Dovedale Nursery
- Director of Information Systems *(E-Safety Manager)*
- Assistant Principal: People & Services
- Student Support Team Leader *(Safeguarding Lead)*

5. MANAGEMENT OF VISITORS

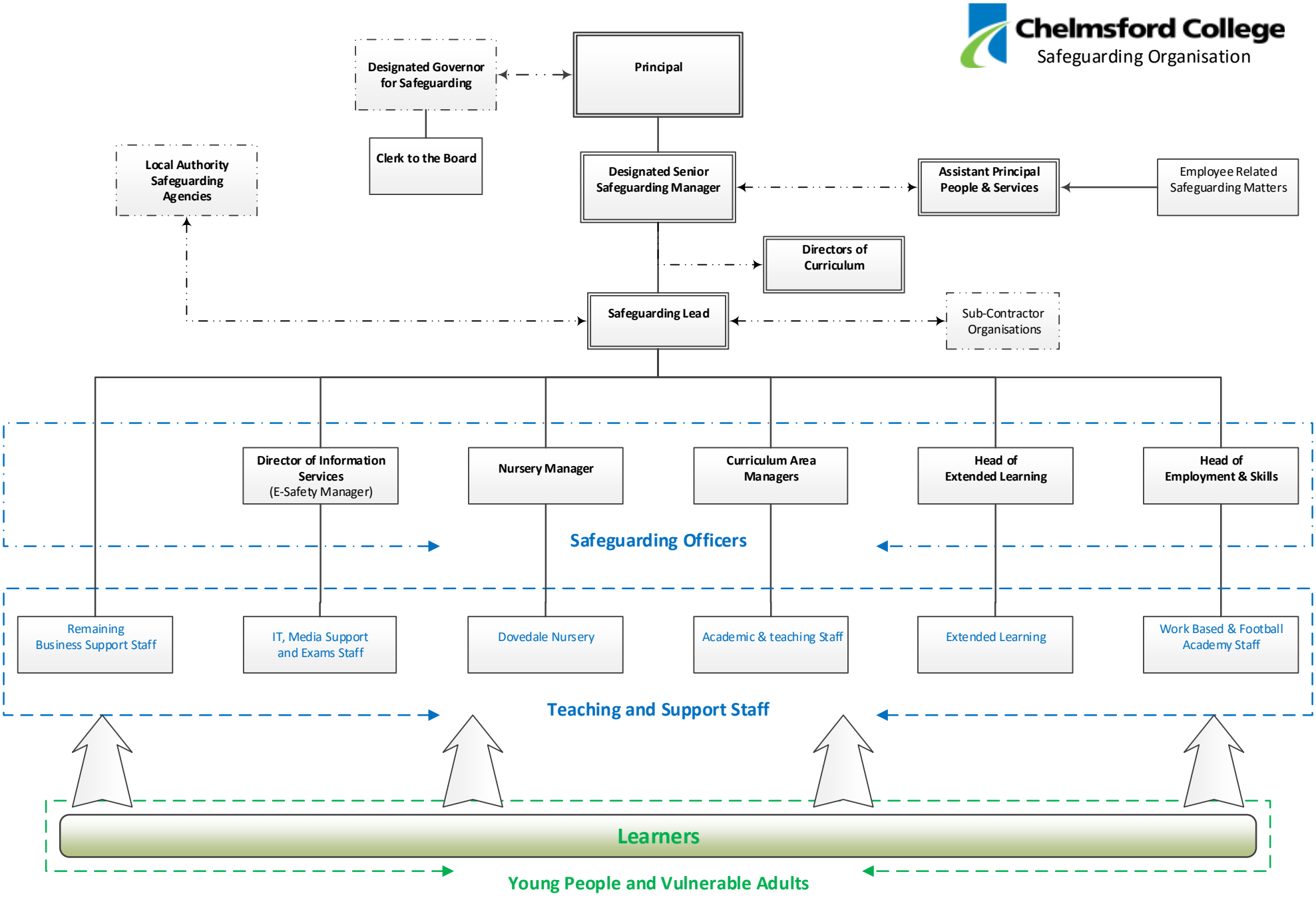
All visitors to the College must go to the appropriate Reception desk before proceeding to any other part of the College estate. Their details should be recorded, they are to be given a Visitor's badge and must be escorted appropriately throughout their visit.

6. TRAINING FOR VOLUNTEERS

The College generally supports the opportunities that volunteering potentially provides to both parties. However, it is important that normal safer recruitment processes are followed which will include the need for some induction including training on: Safeguarding & PREVENT; Health & Safety; and Equality & Diversity.

7. SAFEGUARDING ORGANISATION

The diagram overleaf shows the Safeguarding organisation within Chelmsford College Group:


Chelmsford College
Safeguarding Organisation
Designated Governor for Safeguarding
Principal
Clerk to the Board
Local Authority Safeguarding Agencies
Designated Senior Safeguarding Manager
Assistant Principal People & Services
Employee Related Safeguarding Matters
Directors of Curriculum
Safeguarding Lead
Sub-Contractor Organisations
Director of Information Services (E-Safety Manager)
Nursery Manager
Curriculum Area Managers
Head of Extended Learning
Head of Employment & Skills
Safeguarding Officers
Remaining Business Support Staff
IT, Media Support and Exams Staff
Dovedale Nursery
Academic & teaching Staff
Extended Learning
Work Based & Football Academy Staff
Teaching and Support Staff
Learners
Young People and Vulnerable Adults

Policy in Full

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1. INTRODUCTION

What is Safeguarding?

The term safeguarding children has been variously defined. For example:

> "*Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risks of harm to the individual's welfare are minimised; and where there are concerns about children and people's welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies*"[3].

Under the Education Act 2002 Governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children. Colleges and their staff form part of the wider safeguarding system for young people. This system is described in statutory guidance *Working Together to Safeguard Children*[4].

Some elements which contribute to Safeguarding are shown in Figure 1.

Figure 1 – Elements of Safeguarding

Information included in this document includes elements which have been lifted from the main statutory guidance, *Keeping Children Safe in Education*[5]

This document provides statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002. All College staff are to read at least Part 1 of this guidance, which is available on the intranet.

[3] From Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children 2002
[4] Department for Education Guidance - Working Together to Safeguard Children, March 2015
[5] Department for Education - Keeping Children Safe in Education: Statutory Guidance for Schools & Colleges, September 2016

2. POLICY STATEMENT

Chelmsford College has a statutory and moral duty to ensure that the College promotes the welfare of young people and vulnerable adults receiving education and training in the College; or under the auspices of the College.

Where reference is made to 'children' and/or 'young people' the term is used to mean those under the age of 18. The College recognises that some adults are also vulnerable to abuse and the procedures have been developed to apply to the protection of vulnerable adults and allegations of abuse of this nature.

The College is committed to ensuring:

- A safe environment for young people and vulnerable adults to learn in;
- That young people and vulnerable adults who are suffering, or are likely to suffer significant harm are identified;
- That we will take appropriate action to see that such young people and vulnerable adults are kept safe at the College; and
- Appropriate measures are implemented to keep learners safe from radicalisation and promote British values.

To achieve these aims the College will annually review the policy and procedure with the aim of:

- Raising awareness of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for them to learn within the College;
- Aiding the identification of children, young people and vulnerable adults at risk of significant harm, providing procedures for reporting concerns;
- Discharging the institutions statutory duties with regard to the *PREVENT* strategy;
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff; and
- The safe recruitment of staff

In developing the policy and procedure the College will consult with, and take account of, guidance issued by the Department for Education and other relevant bodies and groups.

The College will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to Social Services or other appropriate agencies.

The College has links with the Local Authority for Safeguarding Matters. Appropriate College staff will contact the Safeguarding Team or Social Care staff as required. They have full knowledge of the local authority safeguarding procedures (including Southend, Essex and Thurrock Child Protection Procedures) and have contact with the Local Authority Designated Officer (LADO).

The College will have a nominated Governor for safeguarding issues. Who will undertake appropriate training.

The Principal and all staff working with children young people and vulnerable adults will receive training adequate to familiarise them with safeguarding issues and their responsibilities within the College policy and procedures; with refresher training at least every three years. A member(s) of the Senior Management Team will have special responsibility for safeguarding issues. The Designated Senior Safeguarding Manager who has lead responsibility for safeguarding in the College is the Director of Learner Development & Inclusion.

Senior managers will ensure that there is a mechanism in place to assist staff to understand and discharge their responsibilities in respect of Safeguarding young people and vulnerable adults. Staff will receive regular Safeguarding updates via the StaySafe Newsletter and intranet News Items.

The governing body will receive an annual report from the Senior Designated Safeguarding Manager which reviews how the duties have been discharged.

3. DEFINITIONS OF ABUSE

The College recognises the following as definitions of abuse:

a. **Physical Abuse**
Physical abuse causes harm to a young person or vulnerable adult. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning of suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

b. **Neglect**
Neglect is the persistent or severe failure to meet a vulnerable adult or young person's physical and/or psychological needs. It will result in serious impairment of the child's health or development.

c. **Sexual Abuse**
Sexual abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.

d. **Emotional Abuse**
Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the vulnerable adult or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive electronic communications.

4. ROLES AND RESPONSIBILITIES

a. Designated Staff with Responsibility for Safeguarding.

The Designated Senior Safeguarding Manager with lead responsibility for safeguarding issues is the Director of Learner Development & Inclusion.

This person is a senior member of the College management team. He has a key duty to take lead responsibility for raising awareness across all staff of

issues relating to the welfare of children, young people and vulnerable adults learning within the College.

The Director has received training in safeguarding issues and inter-agency working, and will receive refresher training at least every two years. He also has specific additional training focused on the PREVENT strategy and aspects of FGM, Forced Marriage and so called Honour Based Abuse.

The Director is supported in his Safeguarding responsibilities by the Student Support Team Leader, and other appropriate staff.

These designated staff members are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies;
- Providing advice and support to other staff on issues relating to safeguarding;
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral);
- Ensuring that parents of children and young people within the College are aware of the College's safeguarding policy;
- Liaising with the Local Authorities and other appropriate agencies;
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for pupils;
- Liaising with employers and training organisations that receive children or young people from the College on long term placements to ensure that appropriate safeguards are put in place;
- Ensuring that staff receive basic training in safeguarding issues appropriate to their roles and are aware of the College safeguarding procedures; and
- All learners, including off site learners or learners on excursions or trips.

The designated senior member of staff will provide an annual report to the governing body setting out how the College has discharged its duties. He is responsible for reporting deficiencies in procedure or policy identified to the governing body at the earliest opportunity.

b. Other Designated Staff Members.

Other members of staff with specific responsibility for safeguarding issues are:

- Directors of Curriculum
- Curriculum Area Managers
- Manager Dovedale Nursery
- Director of Information Systems
- Assistant Principal: People & Services

These designated staff:

- Report to the senior members of staff with Safeguarding responsibility;
- Know how to make an appropriate referral within the College;

- Are available to provide advice and support to staff on issues relating to safeguarding;
- Are available to listen to children, young people and vulnerable adults studying in the College;
- Deal with individual cases, including attending College case conferences and review meetings as appropriate; and
- Have been trained in safeguarding issues and receive refresher training at least every two years.

c. Designated Governor.

The designated governor is responsible for liaising with the Principal and Senior Designated staff member with lead responsibility over matters regarding safeguarding including:

- Ensuring the College has procedures and policies in place which are consistent with guidelines;
- Ensuring the governing body considers the College policy on Safeguarding each year; and
- Ensuring that each year 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 responsible for overseeing the liaison between agencies, e.g. police and social services, and the Chair of Governors in connection with allegations against the Principal or the Senior Designated staff member with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the designated governor shall receive appropriate training.

d. Safeguarding Committee.

A Safeguarding Committee is convened at least 3 times a year. The remit of the Safeguarding Committee is to assess how well the College meets Ofsted requirements, good practice guidance, to assess data in relation to cases dealt with and identify any trends and subsequent strategies to address these. The Safeguarding Committee may include representation from the Local Authority Safeguarding Board. A learner representative may be nominated to sit as part of the Safeguarding Committee and to contribute to the policy and approach to safeguarding issues.

5. DEALING WITH A DISCLOSURE OF ABUSE AND PROCEDURE FOR REPORTING CONCERNS

Where a young person/vulnerable adult discloses abuse to a member of staff the member of staff should report the disclosure to one of the designated safeguarding staff within 2 hours (and must do so within 4 hours) of hearing the allegation. Failure to do so may result in disciplinary action. They should also make a record using the report form on the intranet.

The member of staff concerned should follow the guidelines outlined when hearing the allegation.

a. If a Child, Young Person or Vulnerable Adult Tells You About Possible Abuse:

- Listen carefully and stay calm.
- Do not interview the them, but question normally and without pressure, in order to be sure that you understand what the individual is telling you;
- Do not put words in their mouth.
- Reassure, that by telling you, they have done the right thing.
- Inform the learner that you must pass the information on, but only to those that need to know about it will be told. Inform them who you will report the matter to.
- Note the main points carefully – notes as taken should be submitted and
- not edited.
- Make a detailed note of the date, time, place and what the learner said, did and your questions.

Where a member of staff suspects that a young person or vulnerable adult is being abused the member of staff should not investigate concerns or allegations themselves, but should report them immediately to a designated person who will determine the appropriate action.

Information relating to actual, suspected or alleged abuse should be treated with the utmost care. The designated member of staff should ensure that information is shared only with those staff who need to be aware of it. No-one should be given more information than is necessary to support the young person or vulnerable adult.

b. Reporting and Dealing with Allegations of Abuse Against a Member of Staff:

In rare instances, staff in educational institutions have been found to be responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations made against them. The College recognises that an allegation of child abuse made against a member of staff may be for a variety of reasons and that the facts of the allegation may or may not be true.

The College recognises that the Children's Act 1989 states that the welfare of the child is of paramount concern and will deal with any allegations of this nature sensitively and will act in a careful and measured way.

Where an allegation is made about another member of staff the allegation should be reported immediately to the Director of Learner Development & Inclusion or Assistant Principal: People & Services unless they or the Principal are the person(s) the allegation has been made against; in which case the Designated Governor should be informed.

In the first instance, the Principal, or where the Principal is the subject of an allegation, the Chair of Governors, in the role of 'case manager' should immediately discuss the allegation with the Designated Senior Safeguarding Manager. The purpose of this initial discussion is for the safeguarding manager and the case manager to consider the nature, content and context of the allegation and agree a course of action. The safeguarding manager

may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the young person or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the safeguarding manager in order to help determine whether police involvement is necessary.

If it is agreed an internal investigation should take place the Director of Learner Development & Inclusion will:

- Inform the child/children or parent/carer making the allegation that the investigation will take place and what the likely process will involve;
- Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve;
- Make arrangements with Case Manager to inform the staff member against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve, including considering, with the Human Resources staff, if a period of suspension from work is warranted;
- Where a strategy discussion is needed, or police or children's social care services need to be involved, advise the case manager not to inform the staff member until those agencies have been consulted, and have agreed what information can be disclosed to the accused.
- Inform the Chair of Governors of the allegation and the investigation; and
- Keep a written record of the action taken in connection with the allegation.

The investigation and any action arising from the investigation will be conducted in accordance with the existing staff disciplinary procedures.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed of the College's statutory duty to report Safeguarding concerns under the Disclosure and Barring Services Barred Lists procedures.

As a result of any investigation of this nature the Director of Learner Development & Inclusion will review the process and identify whether there are any matters arising from it that could lead to the improvement of the College's procedures including training needs of staff, and report any recommendations to the Principal and governor with lead responsibility for safeguarding.

6. STATUTORY DUTIES - *PREVENT*

Prevent is 1 of the 4 elements of *CONTEST*, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The PREVENT strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation with which we need to deal.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the *PREVENT* strategy. The police also play a significant role in *PREVENT*, in much the same way as they do when taking a preventative approach to other crimes.

The Home Offices uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- funding a specialist police unit which works to remove online content that breaches terrorist legislation
- supporting community based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities

Recognising its statutory duties, the College is committed to supporting vulnerable learners through its safeguarding agenda in order to prevent potential radicalisation.

7. OTHER RELEVANT POLICIES AND PROCEDURES

a. Selection Procedures

The College has established recruitment and selection procedures for staff that support safeguarding and promote the welfare of young people. These procedures ensure that the College has robust background checks to assess the suitability of applicants to work in an environment of young people and vulnerable adults. The recruitment and selection procedures are reviewed annually and meet the criteria for safe recruitment and address the legislative responsibilities overseen by the Disclosure and Barring service.

b. Associated Policies

The Safeguarding policy is also linked to the following College Group policies and procedures:

PREVENT Policy
e-Safety Policy
Institutional Use of Social Media
Acceptable Use of IT Resources Policy
Data Protection Policy
Anti-Bullying Policy
Staff Grievance Procedures
Student Disciplinary Process
Relationships at Work
Personal Care Policy
WREX Policy
Equality and Diversity Policy
Staff Recruitment and Selection Policy
SECURUS Network Monitoring
Use of Digital Image Policy
Alcohol and Substance Misuse Policy
Recruitment and Vetting Procedures
Complaints Procedure
Staff Disciplinary Procedure
Private Vehicles Used to Transport Learners
Positive Handling & Physical Restraint
H&S Policy

c. External Reference Documents

- DfE Guidance - Working Together to Safeguard Children, March 2015
- DfE - Keeping Children Safe in Education: Statutory Guidance for Schools & Colleges, September 2016
- Home Office – Multi-Agency Statutory Guidance on FGM, April 2016
- Southend, Essex & Thurrock Safeguarding & Child Protection Procedures, November 2016
- Southend, Essex & Thurrock PREVENT Policy & Guidance, January 2017

8. MANAGEMENT OF VISITORS

Visitors to the College are to be directed to the Reception area at either Moulsham Street, Princes Road or Beacon House. The member of staff meeting visitors is required to enter the visitor's name in the Visitors' Book held at the Reception counter. The visitor will be issued with an identification badge which must be worn at all times whilst on College premises. Visitors must be met at the Reception area by a member of staff and accompanied to the arranged activity by them. On completion of the activity, the visitor should be accompanied back to Reception to facilitate them being booked out and returning their visitor's badge.

Staff are encouraged to make their visitors aware of the necessary emergency procedures on arrival at the College and to ensure they are provided with a Safeguarding leaflet. Reception staff must receive prior notification of visitors in order to provide the appropriate response.

9. TRAINING FOR VOLUNTEERS

The college recognises that some individuals wish to gain work experience or contribute to the community through unpaid volunteering activities from time to time. Whilst the College generally supports the opportunities that volunteering potentially provides to both parties, it is important that appropriate consideration is given to the suitability of the volunteer in relation to the voluntary work provided, and that all relevant safer recruitment checks are carried out in

advance of the commencement of voluntary work. The standard recruitment process will be used to approve a voluntary work opportunity, and ensure the suitability of the volunteer worker.

Whilst volunteers undertaking unpaid work are under no obligation to provide services to the College, they will be asked to sign a Volunteer Handbook prior to commencement, which sets out the expectations that the College has and the basis upon which the voluntary work is provided.

As part of the College's expectations volunteers will be required to undertake induction and familiarisation, mandatory training, including: Safeguarding & PREVENT; Health & Safety; and Equality & Diversity.

10. MONITORING AND REVIEW

The Safeguarding Committee will monitor and evaluate the implementation of the policy. Learner representatives will review the policy and procedure and provide input into the content and format of the finalised document.

APPENDIX 1

Guidelines for Staff and Volunteers

Guidance for staff, volunteers and partners dealing with Disclosures of Abuse and Procedures for Reporting Concerns

If a learner tells you that he/she has been physically, sexually, emotionally or psychologically abused in any way you should:

1. Listen to their story without any prompting or leading questions.

2. Reassure the learner that what they are telling you is being taken very seriously.

Do not promise the learner that what they are telling you will be kept totally confidential. Explain that in order for you to help them you will need to discuss what you have been told with a designated 'Safeguarding' member of staff.

Q What are some of the symptoms of child abuse?
It must be stressed that every young person or vulnerable adult is different and symptoms will vary from individual to individual.

A If abuse starts happening to a young person or vulnerable adult their behaviour is likely to change, a calm person may become loud and disruptive; a lively person may become quiet and withdrawn.
The young person or vulnerable adult may:

- Present with bruises and injuries that they have difficulty explaining or that are in places where it is difficult to hurt yourself accidentally, i.e. neck, cheeks, eyes, shoulders and the top of the arms
- Be scared, tearful and may present unusual, difficult or strange behaviour
- Self-harm or place themselves in risky situations, even attempt suicide

Q What if a young person or vulnerable adult tells you that they are being abused?

A Take them seriously; it will have taken a lot of courage to tell someone. Reassure them that they have done the right thing in telling someone. Do not promise to keep what they tell you a secret, if the young person/vulnerable adult ask you to, tell them that you may have to tell someone else to get further help and to keep them safe. Thank them for telling you and follow the procedures.

Q What if you suspect a young person or vulnerable adult is being abused?

A It is not your job to establish whether or not the young person or vulnerable adult is telling the truth. It is your job to pass on your concerns:

- Listen carefully and stay calm;
- Do not interview the young person, but question normally and without pressure, in order to be sure you understand what you are being told;

- Write down what is being said using the young person's words;
- Do not put words into the young person's mouth;
- Reassure them that by telling you, they have done the right thing;
- Stress that information given will be treated confidentially and inform the young person that you must pass the information on but that only those who need to know about it will be told. Inform them of to whom you will report the matter.
- Ensure that the parents or carers are kept informed – notwithstanding the above

You should not investigate concerns or allegations yourself but should report them immediately to one of the College Safeguarding members of staff.

All information disclosed to you should be treated as confidential and must not be passed on to personal tutors or other College employees, except within the College Safeguarding structure.

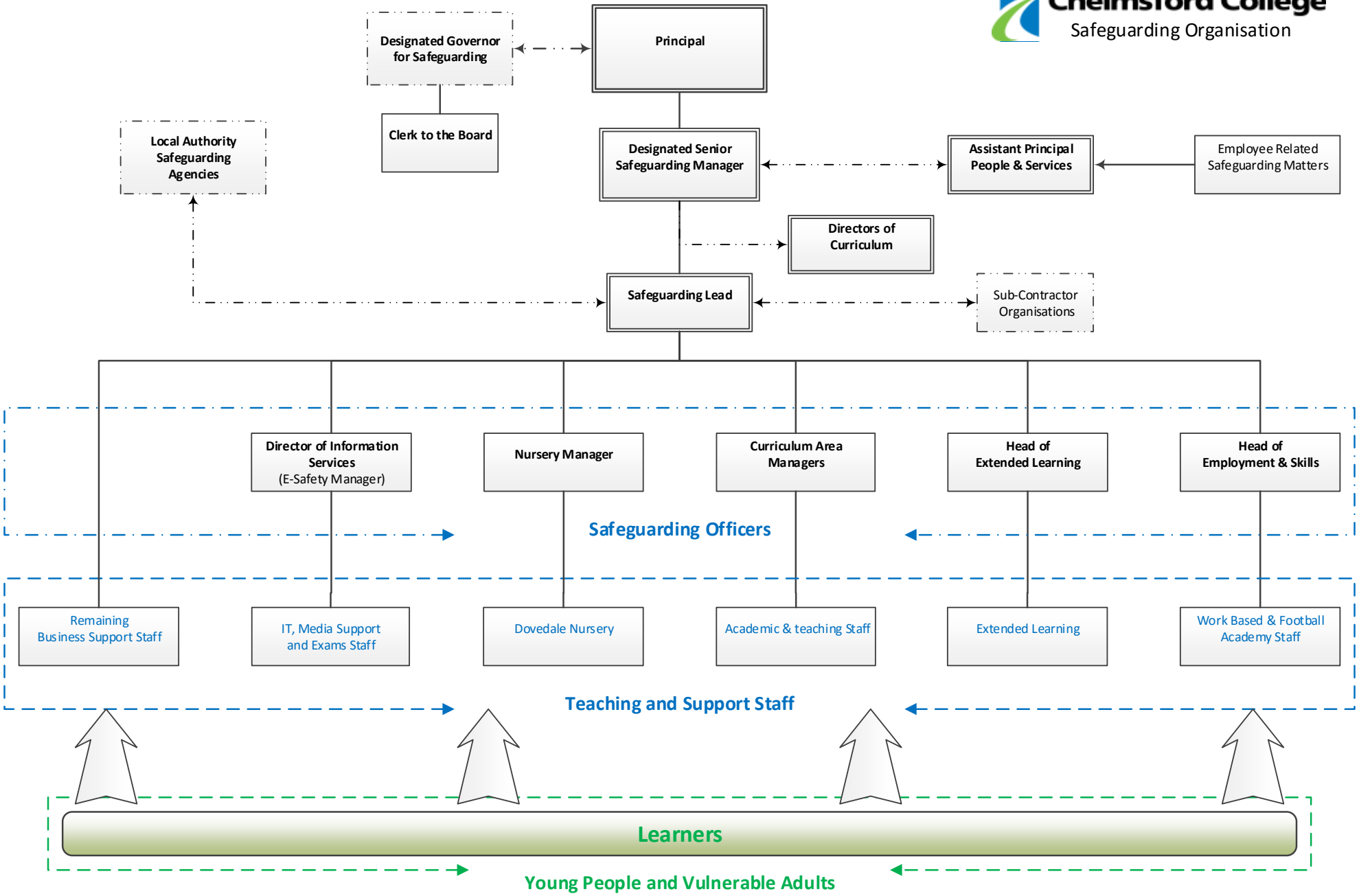
Where concerns and or allegations involve a member of staff you should report them immediately to the senior member of staff with lead responsibility for Safeguarding, the Director of Learner Development & Inclusion, or the Assistant Principal: People & Services. These senior managers will ensure that the Principal is notified.

If for any reason you feel unable to raise an issue with College managers or where you perceive that your genuine concerns are not being addressed, you should follow the College Group Whistleblowing procedures. As a last resort, where internal channels might be inappropriate the government backed NSPCC Whistleblowing Helpline is available from 08:00 to 20:00, Monday to Friday, on 0800 028 0285. Out of hours you can use their email address: help@nspcc.org.uk. You can also write to:

NSPCC
Weston House
42 Curtain Road
London
EC2A 3NH

Chelmsford College

Safeguarding Organisation



Individuals With Safeguarding Responsibilities

Post Title	Post Holder	Phone Extension
Principal	Andy Sparks	3001
Designated Governor	Susan Hughes	
Clerk to the Board	Robert Millea	3002
Designated Senior Safeguarding Manager	Marco Iciek	3039
Deputy Senior Safeguarding Managers: MS	Alison Davies	3435
PR	Simon Drane	3168
Safeguarding Lead	Elizabeth Tugwell	3089
Assistant Principal: People & Services	Mike Tadman	3015
Curriculum Area Managers:		
Art, Design & Media		3323
Business, Law and Travel & Tourism		3603
Construction		3163
Engineering & Electrical		3055
English & Maths		3033
Extended Learning		3011
Hair, Beauty, Hospitality & Catering		3154
Health & Care, Childcare & Access		3610
ICT & Science		3035
Sport & Public Services		3037
Work Based Learners	Sally Gatrell	3128
	Elaine Shreeve	3114
Football Academy Learners	Dave Cornwell	3119
Dovedale Nursery Manager	Sarah Boultwood	3045
Director of Information Systems	Mark Emerson	3036

Reporting Structure for Safeguarding and Child Protection Concerns

Pathway One

Member of staff has Safeguarding concern or receives disclosure from/about young person or vulnerable adult.

- Make a written record including dates and times.
- Advise informant who you will have to tell and why.

Report to allocated Safeguarding Officer; or any other Safeguarding Officer in their absence. *

- Report within 24 hours.
- Complete online Report Form.
- Pass on all notes to CAM – **do not** keep a personal record.

Further Advice

No

Safeguarding Officer addresses concern. NFA required.

- Update online records with key actions and/ or information.
- Retain any paper-based records or notes in Departmental Safeguarding File.

Yes

Refer to Safeguarding Lead .

- Complete online Safeguarding Event Form.
- Pass on any paper-based records or notes

Advice

Advice given to Safeguarding Officer.

- Complete additional detail on online Safeguarding Event Form as required.
- Retain any paper-based records or notes in Departmental Safeguarding File.

Intervention

Intervention required. Safeguarding Lead will coordinate and monitor.

- Update online Safeguarding Event Form giving key events and/or actions.
- Retain any paper-based records or notes in Central Safeguarding File.

Pathway Two

Member of staff has child protection concern or receives child protection disclosure from/about young person or vulnerable adult.

Report to a designated Child Protection Officer. *

- Report within 2 hours.
- Complete online Report Form.
- Pass on all notes – **do not** keep a personal record.

Decision to Refer

No

Safeguarding Lead will Record rationale for no referral.

- Complete online Safeguarding Event Form.
- Retain any paper-based records or notes in Central Safeguarding File.
- Feedback outcome to Departmental Safeguarding Officer

Yes

Safeguarding Lead will liaise with Social Care.

- Complete online Safeguarding Event Form.
- Retain any paper-based records or notes in Central Safeguarding File.
- Feedback outcome to Departmental Safeguarding Officer

Pathway Three

An allegation is made about a member of staff.

Report immediately to:
Senior Safeguarding Manager; or
Assistant Principal: People & Services. *

- Complete online Report Form.
- Pass on all notes – **do not** keep a personal record.

* **For those without access to the College Intranet:**

- Report directly to any Safeguarding Officer.
- Pass on all notes – **do not** keep a personal record.

Designated Child Protection Officers

- Marco Iciek
- Elizabeth Tugwell

College Safeguarding Report Form

SUBJECT OF REFERRAL

Student Reference or Staff Number

Last Name: *First Name*:

For Students Only:

Birth Date: *CAM*:

Tutor Group: *Tutor*:

Does the individual know this referral is being made? ☐ Yes ☐ No

Have you spoken to the individual about these concerns? ☐ Yes ☐ No

Have you had any previous concerns about this individual? ☐ Yes ☐ No

SAFEGUARDING CONCERN

Name of Referrer: *Date of Report*:

Description of concern or issue:

Any other information which might be relevant:

Nursery Safeguarding Report Form

SUBJECT OF REFERRAL

Child Details:

Child Surname _____ *Child Forename:* _____

Child DoB (if known): _____

Parent/Guardian Details (if known):

Surname: _____ *Forename*: _____

Does the individual/Parent know this referral is being made?	☐ Yes	☐ No
Have you spoken to the individual/Parent about these concerns?	☐ Yes	☐ No
Have you had any previous concerns about this individual?	☐ Yes	☐ No

SAFEGUARDING CONCERN

Name of Referrer: _____ *Date of Report*: _____

Description of concern or issue:

Any other information which might be relevant:

APPENDIX 2

Code of Conduct for Staff and Volunteers working with Young Learners and Vulnerable Adults

Introduction

This code has been drawn up to assist in maintaining entirely proper and professional relationships with young learners and vulnerable adults.

It is stressed that this code is not a legal document but is intended to provide guidance to employees in carrying out their responsibilities. However, a breach of the code by a member of staff may result in disciplinary action, which in some cases could lead to dismissal.

Individuals should be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with young learners and vulnerable adults remain and are seen to remain entirely proper and professional. It is recognised that when working with children or adults, individuals are vulnerable to the possible consequences of their close professional relationships with young learners and to the potential for malicious and misplaced allegations being made by young learners or vulnerable adults, either deliberately or innocently, arising from the normal proper associations that staff may have with them.

Code for all Relevant Staff and Volunteers

Physical Contact

- As a general principle, individuals should not have unnecessary physical contact with their young learners or vulnerable adults. There may be very limited occasions when a learner needs comfort or reassurance, which may include physical comforting. Any such comforting gestures must always be acceptable to the young person concerned i.e. there should be no unwanted physical contact, however well intentioned. However, be aware that any physical contact may be misconstrued by a learner, parent/carer or observer. Such contact can include well-intentioned informal and formal gestures such as putting a hand on the shoulder or arm, which, if repeated with an individual young learner, could lead to serious questions being raised.
- Some individuals are likely to come into physical contact with young learners and vulnerable adults from time to time in the course of their training activities, for example when showing a young learner or vulnerable adult how to use a piece of apparatus or equipment. You should give a clear explanation of the intended activity and ask the young person or vulnerable adult if it is alright to proceed. Individuals should be aware of the limits within which such contact should properly take place and should consider the possibility of such contact being misinterpreted by the young learner or vulnerable adult.
- Any form of physical punishment of young learners or vulnerable adults is unlawful, as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that employees understand this both to protect their own position and that of the organisation and the educational establishment.
- There may be occasions where it is necessary to physically restrain a young learner or vulnerable adult to prevent him/her from inflicting injury to himself/herself or others. In such cases only the minimum force necessary

must be used and any action taken must be to restrain a young learner or vulnerable adult. Where an individual has taken action to restrain a young learner or vulnerable adult he/she should report the matter to their manager and should complete an incident report form.

The Practice of Physical Restraint

- Restraint can be defined as the reasonable application of the minimum necessary force to overpower a young person or vulnerable adult with the intention of preventing them from harming themselves or others, or from causing serious damage to property.
- Restraint should only be used exceptionally, when unavoidable and in keeping with the incident leading to it. **It should be primarily for the benefit of the young person/s and, though immediate, should, as far as possible, be a considered response.**
- Restraint should not be used as a form of punishment or, in normal circumstances, to enforce compliance with instructions. It should not be attempted where the member of staff is put at undue risk.
- Incidents of restraint should, in appropriate circumstances, be subject to debriefing for staff and volunteers involved and lead to a review of strategies for managing the behaviour of young learners and vulnerable adults between relevant parties, e.g. manager, teacher, parent/carer, trainer etc. All incidents should be recorded, in writing, with witness statements etc. Please refer to the Student Disciplinary Policy.
- Where staff or volunteers are the subject of physical attack by young learners or vulnerable adults or their parents/carers, they should refer to the guidance provided by the College and report the incident immediately to their manager or the duty officer.

Sexual Contact (in relation to young people under 18 and vulnerable adults)

- There is NO acceptable behaviour that involves either explicit sexual acts or innuendos. Any such behaviour will always be treated as extremely serious and must be reported immediately.

Meetings with Young Learners

- Staff and volunteers should be aware of the potential risks which may arise from interviewing individual young learners and vulnerable adults in private. It is recognised that there will be occasions when confidential interviews must take place but, where possible, such interviews should be conducted in a room with visual access or with the door open, or in a room or area which is likely to be frequented by other people. Meetings with young learners and vulnerable adults away from educational or business premises normally utilised e.g. home or off-side visits should not take place unless specific approval has been obtained from those responsible for the learner (e.g. Line Manager).
- Where such conditions cannot apply, staff and volunteers are advised to ensure that another adult knows that the interview is taking place.
- If it is necessary to detain a young learner or vulnerable adult for any length of time after the end of normal hours, prior warning must be given to the young learner's or vulnerable adult's parents/carers.

Caring/First Aid

- If a young person or vulnerable adult complains of injury or sickness, he/she should be referred to a person qualified in first aid or advised to see his/her own doctor. The young learner's or vulnerable adult's parents/carers should also be informed, if appropriate.

- Where there is a potential threat to life, or the possibility of a significant deterioration in a learner's condition over time, professional medical support must be sought by dialling 999 or 111, as appropriate.
- Staff or volunteers that have to administer first aid (normally a trained First Aider) should ensure, wherever possible, that another adult is present, if they are in any doubt as to whether necessary physical contact could be misconstrued.
- Another adult should accompany staff or volunteers who have to help young learners and vulnerable adults with personal care and young learners and vulnerable adults should, wherever possible, be encouraged to deal with such matter themselves.
- Where it is necessary to assist with/supervise dressing or undressing, staff must be of the appropriate gender and be careful to protect the dignity of the young person or vulnerable adult.
- Male staff or volunteers should not, as a general rule, enter female toilets nor should female staff enter male toilets, except in extreme situations such as fire, or where there may be a threat to life or limb.
- All first aiders must have a DBS check – their qualifications are to be updated on a regular basis.
- Also refer to the procedure for administering medication to learners.

Provision of Advice and Guidance

- Staff or volunteers may be approached by young learners or vulnerable adults for advice. Young learners or vulnerable adults may also appear distressed and staff may feel the need to ask if all is well. In such cases staff must judge whether it is appropriate for them to offer counselling and advice or whether to refer the young learner to a member of staff or another gender or to one with acknowledged expertise, experience or responsibility for that young learner or vulnerable adults e.g. a College counsellor. Staff and volunteers must, in these circumstances, use their discretion to ensure that any probing for details cannot be construed as unjustified intrusion.
- Staff and volunteers are advised **never to stop a free-flowing account/disclosure** of abuse but to make sure that at an appropriate point they inform the young person or vulnerable adult that they cannot keep such information confidential and need to tell someone else to get help. Example "Thank you for telling me, I now need to tell (where possible give the name and position of who will be told) so that we can get some help for you".
- A young learner or vulnerable adult may ask a member of staff or volunteer to "keep a secret", or to promise not to tell other people what they are about to tell them, where this happens the member of staff must explain that they are not able to promise confidentiality as they need to tell someone else if they are to help the young person.
- Where a young person or vulnerable adult is told by a member of staff or volunteer that they cannot promise confidentiality the young person may decide not to continue telling. If a young person starts to say something and then stops, the member of staff needs to try to leave it open for the young person to come back to the discussion; the member of staff must act, following the Safeguarding Procedures and inform one of the Safeguarding Officers.

Social Contact

- Social contact with young learners and vulnerable adults, other than that which is College based or formally organised by the College, should be positively resisted.
- It is recognised that there may be occasions when accidental or reasonable

social contact may be unavoidable e.g. meeting young learners and vulnerable adults at social venues open to the general public or in shops or at private parties. In such circumstances staff should be mindful at all times of their professional relationship with young learners and vulnerable adults.

- Increasingly staff or volunteers may contact young learners and vulnerable adults via use of technology e.g. the Internet, social sites and mobile phones. When using these forms of communication, staff should be careful in their use of language/terminology or images that may be misconstrued or perceived to be inappropriate.
- Staff may use social media to communicate with learners via a College Group social media account for teaching and learning purposes but must consider whether this is appropriate and carry out a risk assessment. It is inappropriate for any personal information or details of learners to be added to any communications of this nature.
- All digital communications with learners must be carried out in line with the college Acceptable Use policies and be professional in tone and content at all times. Online communication with learners may carry risk and therefore, should only be conducted through the college hosted networks. The use of social networking sites and other sites not hosted by the college may be used only where a risk assessment has been completed by the member of staff and prior permission has been obtained from an appropriate manager.
- Staff must not accept social media 'friend' requests from learners without line manager approval except where the member of staff has a connection with the learner beyond the context of the institution.

General Relationships with Young Learners and Vulnerable Adults

- Staff or volunteers should ensure that their relationships with young learners and vulnerable adults are appropriate to the age and gender of the young learner or vulnerable adult, taking care that their conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when dealing with adolescents.
- Comments by staff or volunteers to young learners or vulnerable adults, either individually or collectively, can be misconstrued. As a general principle, staff must not make unnecessary comments to and/or about young learners and vulnerable adults which could be construed to have a sexual connotation. It is also unacceptable for staff to introduce or to encourage debate amongst young learners and vulnerable adults in a class, training situation or elsewhere, which could be construed as having a sexual connotation that is unnecessary given the context of the training session or the circumstances. However, it is recognised that a topic raised by a young learner or vulnerable adult is best addressed rather than ignored.
- Staff and volunteers should be careful in their use of language and/or terminology that may be misconstrued.
- The systematic use of insensitive, disparaging or sarcastic comments is unacceptable.
- If staff or volunteers, at any time, feel that their relationship with a young learner or vulnerable adult is developing into one that would be in appropriate between a member of staff/volunteer and a young learner or vulnerable adult, it is their responsibility to discuss the situation with their line manager.

Transporting Learners

- Only authorised members of staff, who have been properly certificated under the requirements of the Driving at Work Policy, may use the College minibus to transport learners.

- Learners must not be transported as passengers in a member of staff's private vehicle at any time; except with the explicit sanction of SMT and due regard to the provisions within the Private Vehicles Used for the Transportation of Learners Policy.

Reporting of Incidents

- Following any incident where a member of staff or volunteer feels that his/her actions have been, or may be, misconstrued, the member of staff should report the matter to their manager.
- Such reporting is especially important in any case where a member of staff or volunteer has been obliged to restrain a young person or vulnerable adult physically to prevent him/her from inflicting injury to others or themselves, or where he/she has been personally attacked by another young learner, parent or carer.

Further information on Child Sexual Exploitation and Female Genital Mutilation

***Child Sexual Exploitation* (CSE)**: involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

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

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on page 40 of the Multi-Agency Statutory Guidance[6], and Annex D, Section 2.11 of that guidance (pp59-61) focuses on the role of schools and colleges.

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on 15

Actions

If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. When mandatory reporting commences in October 2015 these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

[6] Female genital mutilation: Multi-agency Statutory Guidance, April 2016

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon **teachers[7], along with social workers and healthcare professionals, to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty will commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

[7] In relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

Arrangements for Visiting Groups & Speakers

Legislative Framework

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have "due regard to the need to prevent people from being drawn into terrorism". The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.

Risk Assessments

The College takes seriously its responsibility to exclude those promoting extremist views that support or are conducive to terrorism. Outside speakers who are deemed to have extremist views are not to be invited into the College.

The College has a robust system for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled or whether mitigating action is required (for example a member of staff alerting the further education Prevent co-ordinators to concerns in relation to a guest speaker). At the outset, organisers must satisfy themselves that the proposed title or theme of the event does not present a potential risk that views/opinions expressed by speakers may be in breach of the law.

All instances where Groups or individuals have been invited to a College campus to interact with learners must be entered on EVOLVE; selecting '*Visiting Speaker*' as either the primary or secondary purpose. Event organisers will be required to provide answers to the following questions:

- Do any of the subjects likely to be covered by the visiting speaker or group have the potential to affect any particular group of learners either positively or negatively?
- Is the invited speaker or group known to hold any extremist views, whether violent or non-violent?
- Briefly outline the arrangements you have put in place to supervise the visiting speaker or group during their time on College premises

A generic risk assessment is available which highlights the Safeguarding factors which must be taken into account during visits by groups or speakers. CAMs are responsible both for approving such visits and ensuring appropriate mitigation is in place to counter any associated risks.

Supervision

All visiting speakers are to be supervised by a member of the College's staff, who are expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form. Staff are required to book events using the EVOLVE system, with sufficient notice to allow the Senior Management Team to undertake checks and for cancellation to take place if necessary.

External Speaker Code of Conduct

It is the responsibility of the event organiser to ensure that:

- this Code of Conduct is communicated to all external speakers (once approved and confirmed via EVOLVE)
- that all reasonable steps are taken to ensure that the requirements within it are upheld during the running of the event or activity.

Freedom of speech is a fundamental right. However, whilst the law promotes and protects freedom of speech, it also places limits on those freedoms in order to maintain public order and safety and to ensure that there is no breach of the law. The College recognises that in this context a conflict exists between the laws which promote freedom of speech and those which restrict it and consequently acknowledges that it has a legal responsibility to create a balance between minimising the possibility that extremism or unlawful conduct will arise on campus and ensuring that it meets its legal obligations in relation to securing freedom of speech.

The College expects external speakers to act in accordance with the law and not to breach the lawful rights of others. Segregation by sex is not permitted in any events, lectures or meetings provided for students, or at events attended by members of the public or employees of the College. Segregation is therefore not permissible for any event involving external speakers or groups and covered by this Code of Conduct. The only exception to this is events that are for the purpose of collective religious worship.

Set out below are some examples of the College's expectations however, this is not intended to be an exhaustive list of unacceptable conduct by external speakers. The College reserves the right to not permit an external speaker to speak at or attend an event, to refuse to permit an event and/or to halt an event at any time if it reasonably considers there may be a breach of any legal obligation.

During the course of the event at which he or she participates, **no speaker shall**:

- Act in breach of the criminal law.
- Incite hatred or violence or any breach of the criminal law.
- Encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism.
- Spread hatred and intolerance.
- Discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age.

- Defame any person or organisation.
- Raise or gather funds for any external organisation or cause without express permission of the Senior Management Team.

During the course of the event at which he or she participates, **all speakers are to**:

- Comply with the College's External Speaker Code of Conduct
- Present ideas and opinions, in particular those that may be contentious or potentially offensive, in the spirit of academic debate, being open to challenge and question.
- Follow the University's policy on and instructions relating to health and safety.

Equality Impact Assessment (EIA) Initial Screening Form

Name of the Policy, Procedure, Practice or Proposal being screened:

College Group Safeguarding Policy

Provide a brief description of its purpose:

This policy provides a statement of the mechanisms by which the College will meet its statutory and moral duty to ensure that the it promotes the welfare of young people and vulnerable adults receiving education and training in the College; or under the auspices of the College.

Are there controls in place to monitor the uniform application of this practice? (if no please explain below)	**Yes**	~~**No**~~

Safeguarding practices should be applied universally to all those who interact with the College. All employees undergo Safeguarding training which is refreshed at least once every 3 years to ensure that they understand their responsibilities. Any Safeguarding concerns are raised with the appropriate manager or the Safeguarding Committee if appropriate. Oversight is provided by the nominated Governor.

Does the policy or process have the potential to affect a particular group disproportionately in either a positive or negative way? Please provide comments with supporting evidence:

As the procedure applies equally to all groups, it has not been identified that it has the potential to affect any particular group disproportionately to any another.

If you have identified a medium or high equality impact please complete the following, otherwise leave blank. Add additional comment below the questions as necessary.

Are there any other policies or practices that need to be assessed alongside this screening?	**Yes**	**No**

Should the policy or practice proceed to a full Equality Impact Assessment?	**Yes**	**No**

If the answer to the above question is no, please give the reasons for this decision:

If a full impact assessment is required, please give the date by which it will be completed	

(Note – If you have assessed a negative impact as high, you must seek advice and conduct a full EIA on a high priority basis)

Declaration:

We are satisfied that an initial screening has been carried out and a full Equality Impact Assessment [~~is~~ / is not] required at this time.

(If a full EIA is required, a template form is available within the EIA Guidance Notes which must be read before completing a full EIA).

Manager:

Signature:	M Iciek	Date:	03 Sept 2015

Countersigned

Signature:	A Sparks	Date:	03 Sept 2015