



# Safeguarding & Prevent Policy

Policy Area:	Safeguarding
Policy Lead:	Assistant Principal Student Experience
Approval By:	Governing Board
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## 1. Introduction

At East Sussex College, we recognise the fundamental right of children, young people, and vulnerable adults to be protected from harm and exploitation. We understand that students and apprentices can only learn effectively when they feel safe and secure. We are committed to upholding the highest standards of safeguarding practices across all our campuses and facilities.

East Sussex College is committed to:

- Providing a safe environment for young people and vulnerable adults.
- Identifying young people and adults who are or may become vulnerable who are suffering, or likely to suffer, significant harm, and ensuring they are kept safe.
- Safeguarding young people and adults from being drawn into committing terrorist- related activity.

## 2. General principles

East Sussex College will annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of young people and adults who are or may become vulnerable and promoting a safe environment for these students and apprentices when learning within college.
- Aiding the identification of young people and adults who are, or may become, vulnerable, who are at risk of significant harm, and providing procedures for reporting and addressing concerns.
- Establishing procedures for reporting and dealing with allegations of abuse and exploitation.
- Ensuring the robust recording of safeguarding concerns and subsequent follow-up on pro-monitor.
- Monitoring procedures which promote safer use of the internet and technology as per the college's Online Safety Policy.
- Ensuring the safe recruitment of staff and the maintenance of a single central record.
- Ensuring that individuals at risk of being drawn into terrorism are identified and are referred to the Prevent and Channel Co-ordinator for appropriate support.

In developing policies and guidelines, East Sussex College will consult with, and take account of, guidance issued by the Department for Education and East Sussex Local Safeguarding Children's Board, and other relevant bodies and groups. East Sussex College will act in accordance with guidance provided in the publication [Keeping Children Safe in Education](#).

This policy applies to all persons acting on behalf of, or engaged in, activities associated with East Sussex College including, for example, members of the Governing Board, staff employed by the college, visitors to and contractors working at college premises.

The East Sussex College Governing Board will appoint a Governor with specific responsibility for Safeguarding and Prevent. They can be contacted by email via the Director of Governance. Any concerns about the conduct of staff should be taken to the Director of People. Any concerns about the CEO & Principal, Director of People or the Designated Safeguarding Lead (DSL) should go to the Chair of the Governing Board via the Director of Governance.

The DSL will notify the nominated governor and the ESFA where the college, or one of its subcontractors, is subject to a safeguarding investigation by the police or the local authority.

### 3. Policy statement

East Sussex College has a statutory and moral duty to ensure that it is working together as a college community and with external partners to safeguard students and apprentices, specifically protecting young people and adults who are, or may become, vulnerable and who are experiencing or likely to experience significant harm.

Throughout this policy and procedure reference is made to '*young people and vulnerable adults*'. This term is used to mean 'those under the age of 18' and adults who are, or may become, vulnerable.

The Governing Board recognises that some adults are also vulnerable to abuse and exploitation, and accordingly the procedures may be applied (with appropriate adaptations) to allegations of abuse and exploitation and the protection of vulnerable adults. Where appropriate, the college will also refer to the [Sussex Safeguarding Adults Policy & Procedures](#).

Safeguarding and working together to safeguard young people is a broader term than child protection. It includes protecting young people from maltreatment, preventing impairment of mental and physical health or development and ensures young people can grow up in safe circumstances.

Child protection forms part of safeguarding and refers to activities undertaken to prevent young people suffering, or likely to suffer, significant harm.

When operating this policy East Sussex College uses the following accepted governmental definitions of extremism and radicalisation which are:

- Extremism: '*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas*'.
- Radicalisation: '*the process by which a person comes to support terrorism and forms of extremism leading to terrorism*'.

### 4. Designated staff

A list of designated persons with specific responsibility for safeguarding and child protection is given at Appendix 1.

### 5. Associated safeguarding policies and procedures

This policy should not be read in isolation: safeguarding and ensuring the safety and welfare of students and apprentices and staff is at the core of East Sussex College's activities and staff should therefore read and familiarise themselves with the following policies and procedures:

- Admissions Policy
- Bullying & Harassment Policy
- Equity, Diversity & Inclusion Policy
- General Data Protection Policy
- Health, Safety & Welfare Policy
- IT Acceptable Use policies
- Online Safety Policy
- Safeguarding Procedure
- Staff Code of Conduct

- Staff Disciplinary Policy
- Staff Recruitment & Selection Procedure
- Student Behaviour Policy
- Student Disciplinary Procedure
- Student Positive Mental Health & Wellbeing Policy
- Trips & Visits Procedure & Guidance
- Work Experience & Placement Policy

## 6. Preventing extremism and radicalisation

All staff will complete Prevent training alongside safeguarding training upon induction to the college, receiving regular updates annually and as needed.

As part of their broader safeguarding responsibilities, college staff will be alert to various indicators. These include:

- Student disclosures of exposure to extremist actions, views, or materials outside of college
- Graffiti promoting extremist messages
- Online access to extremist material
- Parent or carer reports of behavioural changes

Staff will also be aware of:

- Local authority and police reports
- Students and apprentices voicing extremist opinions or glorifying violence
- The use of hate terms to exclude or incite violence
- Intolerance of differences
- Attempts to impose extremist views on others
- Remarks about attending extremist events or rallies
- Who to contact to make a Prevent referral

## 7. Promoting British values

In line with the expectations within the Prevent Duty (Counter Terrorism and Security Act June 2015) the college promotes fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. The college promotes these values to its students and apprentices and staff, embedding them across all areas of college activity and ensuring that they are at the heart of everything the college does.

## 8. Hate crimes

Hate crimes are a criminal offence committed against individuals or groups based on characteristics such as race, religion, sexual orientation, gender identity, disability, or any other protected characteristic. It is vital that the college recognises, prevents, and responds to hate crimes to ensure a safe and inclusive environment for all students and staff. The college is committed to promoting a culture of respect and equality, where any form of hate crime is promptly addressed. All incidents will be taken seriously, with appropriate support provided to victims, and action taken in accordance with the law and the college's behaviour management procedures.

## 9. Safer recruitment

East Sussex College pays full regard to DfE guidance [Keeping Children Safe in Education](#). All appropriate measures are applied to everyone working at the college who is likely to be perceived by

students and apprentices as a safe and trustworthy adult, including volunteers and staff employed by contractors.

All staff, including international host families, are subject to checks through the Disclosure and Barring Service (DBS). This service carries out criminal record checks to identify unspent convictions of potential staff as per the Rehabilitation of Offenders Act (ROA) 1974. In addition, staff will have two references requested prior to employment. Where suitability checks are delayed a risk assessment will be undertaken and staff will be unable to work unsupervised as per the college's Staff Recruitment and Selection Procedure.

The college maintains a Single Central Record (SCR) as required and detailed in Keeping Children Safe in Education. The SCR identifies whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- Identity check
- Enhanced Disclosure and Barring Service (DBS) check
- Barred list check & risk assessment date (if DBS has not been received when staff member starts)
- Further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions
- Check of professional qualifications
- Prohibition check for teaching staff
- Check to establish the person's right to work in the United Kingdom

As a college, online searches of shortlisted candidates may be completed as part of pre-recruitment due diligence checks and shortlisted candidates are informed of this. A Google search will be carried out as part of pre-employment checks for staff offered employment at the college. In addition, candidates are required to complete a self-declaration & disclosure form during the interview process.

Under no circumstances will anyone in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a person under 18.

Staff working with under 18s should not place themselves, or their students and apprentices, in vulnerable situations. Consideration must always be given to both the environment and the staff member's own behavior to minimise risk. Staff should avoid, where possible, lone working with a student.

Please refer to the Staff Recruitment and Selection Procedure.

## 10. Induction & staff training

All new staff will be made aware of safeguarding processes and systems within East Sussex College; these are explained to them as a mandatory part of staff induction and include this policy, the Staff Code of Conduct and the role of the DSL, the Safeguarding Managers (Deputy DSLs) and the Personal Development and Wellbeing Tutors, and they are asked to read and confirm their understanding of Keeping Children Safe in Education Part 1.

In addition to a mandatory online safeguarding module, new staff also attend an induction session which includes face to face safeguarding and Prevent training.

Temporary staff and volunteers are asked to read and confirm their understanding of Keeping Children Safe in Education Part 1 and are given a copy of this policy.

All college staff know what to do if a student raises concerns or makes a disclosure of abuse, exploitation and/or neglect. Staff will maintain a level of confidentiality whilst liaising with the DSL, Deputy DSLs or the wider Wellbeing team. Our staff know not to promise a student that they will not tell anyone about a disclosure or allegation, recognising this may not be in the best interest of the student.

All staff receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively. Face to face safeguarding training is delivered to all staff at the beginning of each academic year and as part of new staff inductions.

The DSL, Lead Deputy DSL, Deputy DSLs, 14-16 Safeguarding Lead and the Personal Development and Wellbeing Leads have all undertaken the local authority DSL training.

Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals. The training provides them with the knowledge to ensure their college's safeguarding policies and procedures are effective. The DSL and DDSL meet regularly with the Safeguarding link governor. Governors should report any safeguarding concerns or incidents to the DSL or to one of the DDSLs.

If a staff member has a concern about a member of the Governing Board, they should report it to the DSL.

Staff should refer to the Safeguarding Procedure if a student makes a disclosure of abuse, exploitation or harm. If staff are unsure, they should always speak to the DSL or deputy DSL.

If staff members have any concerns about a student's welfare, they should act on them immediately. Staff should not assume a colleague, or another professional will take action.

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

## **11. Guest speakers & visitors**

East Sussex College values the opportunities presented by external speakers for students and apprentices to experience diverse opinions and to enter into debate. This is seen as an essential part of both personal and academic development.

The college values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate. The college values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal guidelines.

The college recognises and supports the moral and legal frameworks of the society and community within which it works.

The college will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive 'street', misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.

The college will not tolerate behaviour that demeans individuals or groups based on ethnicity, race, religion, sexuality, gender, disability, age, or lawful working practices, or that creates an environment of harassment, intimidation, or violence.

Visitors must report to reception and must be supervised throughout their visit (unless appropriate checks have been carried out), and leaflet distribution requires approval from the campus Assistant Principal. External room bookings are subject to due diligence to align with college policies and values.

## **12. Safeguarding students aged 14-16**

The college recognises the additional vulnerabilities of younger students, however overall responsibility for the safeguarding of 14-16 students remains with the referring school or authority.

Safeguarding managers must refer any concerns to the Designated Person in School, such as the Deputy Principal, if they are still on the school roll. However, this does not negate the responsibility placed on staff to act immediately and appropriately if a disclosure is made.

Schools and local authorities must be informed immediately to ensure a collaborative and transparent approach.

The responsibility for safeguarding students who are electively home educated rests with the college and arrangements align with the arrangements for safeguarding full time students under 18.

The Future College Co-ordinator and Safeguarding Lead is fully DSL trained and oversees all students within the 14-16 curriculum.

## **13. Work-based learning**

All apprentices on work-based learning programmes receive an induction, which includes raising awareness of the college's commitment towards safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Safeguarding team.

The understanding of all aspects of safeguarding, preventing extremism and radicalisation and safe working practices is checked at each review and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's wellbeing is safeguarded by the work placement assessors.

The college has arrangements in place to ensure that, prior to work-based learning commencing:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant college policies
- The requirements for DBS checks are assessed and the relevant processes undertaken



## 14. Work experience

All work placement providers will be given safeguarding information at the time of placement. The college has arrangements in place to ensure that, prior to work experience:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant college policies
- The requirements for DBS checks are assessed and the relevant processes undertaken

## 15. Partner delivery

All students and apprentices on courses delivered by an East Sussex College partner receive details of the support services offered and contact details for the safeguarding team. The understanding of all aspects of safeguarding, including preventing extremism and radicalisation and safe working practices, is checked at each partner review and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's wellbeing is safeguarded by the staff in the subcontracting team. The college has arrangements in place to ensure that, prior to a course commencing:

- A risk assessment of the premises is carried out
- All insurance documents are checked and copies taken
- Partners are made aware of relevant college policies
- Annual check of safeguarding policy to include the Prevent Duty
- All staff in contact with students and apprentices under the age of 18 years are DBS checked and details monitored and updated as necessary
- All delivery staff are required to complete safeguarding and Prevent training

The college will respond to allegations relating to incidents occurring when an individual or organisation is using the college's premises. As with all safeguarding allegations, safeguarding policies and procedures will be followed, including informing the Local Authority Designated Officer (LADO).

## 16. Out of hours trips

[Keeping Children Safe in Education](#) highlights the need for 24 hour safeguarding support to be available when students are off-site, and as such an emergency safeguarding number is issued when trips or visits will last longer than the average college day. The relevant campus Assistant Principal will be the contact point for this and will liaise with the Executive Director Curriculum & Skills as required. For more information please see the Trips & Visits Policy.

## 17. International & ESOL students

The college will ensure that for students where English is not their first language the induction on safeguarding is delivered so that they gain a full understanding. There will be a strong focus on the promotion of values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

First points of contact for International or ESOL safeguarding issues are the Heads of Curriculum for International in Eastbourne and Hastings, and the Senior International Tutor in Lewes. They work closely with the campus safeguarding managers and team.

## 18. Students & apprentices with a learning difficulty or disability

Students and apprentices with learning difficulties and/or disabilities can face additional safeguarding challenges. The college will ensure that students and apprentices who have a learning difficulty or disability are made fully aware of the safeguarding procedures during their initial assessment and induction. This will ensure that the information is delivered and adapted so it is accessible and meets their individual need.

Information on how to contact the safeguarding team will also be adapted when required; a safeguarding email address is available. The expectation is that learning support staff or the Study Programme Tutor will act as their first line of contact. This is particularly important for those students and apprentices who have communication support needs.

All college staff working with vulnerable young people and adults will receive training on safeguarding responsibilities and relevant college policies. This training will be refreshed annually. Designated senior management and safeguarding officers will also receive annual training.

The college will refer concerns that a young person or vulnerable adult might be at risk of significant harm to appropriate external agencies.

## 19. Children who have a social worker

Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and positive mental health. The college will identify the additional needs of these students and apprentices and provide extra monitoring and pastoral support to mitigate these barriers. Staff must provide support for Looked After Children (LAC) and those children who have been previously Looked After in recognition that they remain vulnerable.

## 20. Private fostering

A private fostering arrangement is one that is made privately, without the authority of the local authority for the care of a child under the age of 16 or 18 if disabled, by someone other than a parent or close relative. These young people may be vulnerable, particularly if they have come from another country. In some cases, they are affected by abuse, exploitation and neglect, or are involved in trafficking or child sexual exploitation. There is a mandatory duty to inform the local authority of children in such arrangements.

## 21. Missing children & attendance concerns

All students and apprentices under 18 or who are vulnerable adults who go missing or their whereabouts are unknown will be reported to police. If the student is deemed to be at immediate risk a Safeguarding Manager will report this to police immediately. Any relevant information that might help to find or support the child will be shared. If the student is a Looked After Child, a Care Leaver or an Unaccompanied Young Person the college will immediately contact police and social services.

The college is required by law to report on the attendance of international students to the UK Border Agency (UKBA). The college will report non-attendance in the following circumstances:

- Attendance drops below 80%, including absence due to lateness
- Failure to enrol on a course or withdrawal from a course

- Unauthorised absences of greater than 2 consecutive weeks OR 10 missed contacts
- Change of course
- Other significant circumstances which may affect their visa conditions

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation (FGM) and forced marriage.

It is important to note that being absent, as well as unexplained and persistent absences from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Regular attendance checks are carried out and non-attendance is followed up. The completion of registers is a legal duty for all staff assigned them; this is monitored by managers and any non-completion addressed.

## 22. Parental involvement

The safeguarding team will contact parents/carers of students and apprentices under the age of 18 to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referrals to children's social care, unless it is deemed that it may place the student at greater risk.

Where possible a Safeguarding Manager will keep the parent/carer informed of actions and progress.

## 23. Online safety

Online safety addresses the safe use of the internet, smartphones, and electronic communications for young people and adults, both in and out of college. It involves raising awareness of risks and responsibilities among the college community and is part of the duty of care for those working with young people and vulnerable adults.

Staff will be trained on e-safety practices to protect students and apprentices and vulnerable adults. They will also learn to manage their professional online reputation and appropriate online behaviours, as outlined in the Staff IT Acceptable Use Policy and Staff Code of Conduct. Personal use of social media will be discussed during staff induction. Staff must use only college-provided email accounts for communication with students/apprentices and parents/carers.

Online safety education will be included in student inductions and the tutorial programme. Safe and responsible use of technology will be reinforced across the curriculum. Students and apprentices will be advised not to share personal details, per the Student IT Acceptable Use Policy. Special attention will be given to vulnerable students and apprentices.

The Designated Safeguarding Lead/Deputy Designated Safeguarding Leads will be informed of online safety incidents, escalating child protection or vulnerable adult concerns as needed. Illegal material will be reported to relevant agencies. E-safety incidents will be recorded and managed according to the college's disciplinary policies.

The college uses Smoothwall for filtering and monitoring devices and networks, overseen by safeguarding managers and the IT Services team. Any concerns are addressed immediately. Staff receive training on their roles and responsibilities in relation to filtering and monitoring.

## 24. County Lines

County lines involves adults who recruit young people and children to become involved in illegal activities, most often involving either drug selling or drug and weapons transportation. These young people are often coerced by being offered money, valuable items, friendship or anything else that the young person may need/want. This could include a 'safe' place to stay.

The college will work with external agencies to identify young people who are either engaged or at risk of engaging, in county lines activity. Information will be held and shared appropriately to safeguard all students and apprentices. Localised information will be updated and actioned regularly through liaison with Sussex Police.

Training will be given to all staff around the signs, implications and effects on young people and updated regularly. Staff will be given training and support to report concerns to the safeguarding team.

Information sessions will be delivered to students and apprentices through effective tutorials and/or external agency involvement.

Support will be offered to staff and students and apprentices through the college's safeguarding and wellbeing teams where appropriate.

## 25. Female genital mutilation (FGM)

Staff must report any discovery of FGM; this is a legal requirement since October 31, 2015. FGM is extremely harmful, causing long-term physical and mental suffering, infertility, childbirth complications, and even death. It cannot be justified as a cultural or religious practice. Concerns about any students and apprentices must be reported to the safeguarding team for immediate referral to the police or directly to the police via the 101 reporting system, and then referred to the safeguarding team.

## 26. Safeguarding allegations made against, and concerns raised about, college staff

When allegations of a safeguarding nature (including low level concerns), are made against College staff (including those working on a temporary, voluntary or self-employed basis) these MUST be reported to People Services immediately. Please see the Staff Disciplinary Policy for reporting information and process.

## Appendix 1: Safeguarding structure at East Sussex College

The CEO & Principal remains accountable for safeguarding at East Sussex College and is the nominated DSL. Operational responsibilities are delegated to the Assistant Principal Student Experience who directly leads and supports the Safeguarding Managers.

