EAST SUSSEX COLLEGE

Safeguarding & Prevent Policy

Policy Area:	**Safeguarding**
Policy Lead:	**Assistant Principal Safeguarding & Inclusion**
Approval By:	**Board**
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1. Introduction

1.1. 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 practice across all our campuses and facilities.

1.2. 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 and 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.

1.3. This policy is developed in line with guidance issued by the DfE, Keeping Children Safe in Education (KCSiE), and other relevant statutory bodies, in consultation with East Sussex Local Safeguarding Children's Board and other relevant groups.

2. Policy statement

2.1. East Sussex College has a statutory and moral duty to work 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.

2.2. To meet this duty, the college aims to:

- Raise awareness of issues relating to the welfare of young people and adults who are or may become vulnerable, and promote a safe environment for students and apprentices while learning at college.
- Aid the identification of young people and adults who are, or may become, vulnerable and at risk of significant harm, and provide clear procedures for reporting and addressing concerns.
- Establish procedures for reporting and dealing with allegations of abuse and exploitation.
- Ensure safeguarding records and communications comply with Department for Education (DfE) data protection guidance, including secure storage, controlled access, and clear consent and information-sharing procedures.
- Ensure the robust recording of safeguarding concerns and subsequent follow-up on pro-monitor.
- Monitor procedures which promote safer use of the internet and technology, as set out in the college's Online Safety Policy.
- Ensure the safe recruitment of staff and the maintenance of a Single Central Record.
- Ensure that individuals at risk of being drawn into terrorism are identified and referred to the Prevent and Channel Co-ordinator for appropriate support.

2.3. Throughout this policy, 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.

2.4. 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.

2.5. 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 ensuring young people can grow up in safe circumstances.

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

3. Scope

3.1. This policy applies to everyone acting on behalf of, or engaged in activities associated with, East Sussex College, including:

- Members of the Governing Board.
- All staff employed by the college, including temporary staff and volunteers.
- Visitors to, and contractors working at, college premises.
- Staff employed by, or acting on behalf of, delivery partners and subcontractors.

3.2. It covers the safeguarding of all students and apprentices under the age of 18, and of adults who are, or may become, vulnerable, in line with the definitions set out in the Policy Statement. This includes, but is not limited to:

- Students and apprentices on work-based learning, work experience, or partner-delivered provision.
- Students aged 14-16 on the college roll.
- International and ESOL students.
- Students and apprentices with a learning difficulty or disability.
- Students who are Looked After, previously Looked After, or have a social worker.
- Students in kinship care or private fostering arrangements.

3.3. Where a specific group has additional or distinct arrangements, these are set out under the relevant heading later in this policy.

4. Definitions/glossary

4.1. **British values –** Democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, as set out in the Prevent Duty (Counter-Terrorism and Security Act 2015).

4.2. **Channel –** A voluntary, confidential programme providing support to individuals identified as being at risk of being drawn into terrorism.

4.3. **Child protection –** See Policy Statement.

4.4. **County lines –** Where adults recruit young people and children to become involved in illegal activities, most often drug selling or the transportation of drugs and weapons, typically through coercion involving money, goods, friendship, or accommodation.

4.5. **DBS –** Disclosure and Barring Service. Carries out criminal record checks on prospective and existing staff.

4.6. **Designated Safeguarding Lead (DSL) –** The senior member of staff with lead responsibility for safeguarding across the college.

4.7. **Deputy DSL (DDSL) –** A senior lead on safeguarding who oversees the work of the Safeguarding Managers and supports the DSL.

4.8. **Domestic abuse –** As defined in the Domestic Abuse Act 2021: a range of abusive behaviours between those aged 16 or over who are personally connected, including physical, emotional, sexual, financial, and coercive or controlling behaviour. Children who see, hear, or experience the effects of domestic abuse are considered victims in their own right.

4.9. **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 the armed forces, whether in this country or overseas.

4.10. **FGM –** Female Genital Mutilation. A form of abuse causing long-term physical and mental harm; discovery must be reported to the police, and it cannot be justified on cultural or religious grounds.

4.11. **Hate crime –** A criminal offence committed against an individual or group based on a protected characteristic, such as race, religion, sexual orientation, gender identity, or disability.

4.12. **KCSiE** — Keeping Children Safe in Education — the DfE's statutory safeguarding guidance for schools and colleges, which this policy gives effect to.

4.13. **Kinship care –** An arrangement where a child is cared for by a relative or someone connected to them, rather than by their parents.

4.14. **LADO –** Local Authority Designated Officer. Notified where an allegation is made against a member of staff, or where an incident occurs involving use of college premises.

4.15. **Modern slavery –** Exploitation including forced labour, servitude, forced criminality, human trafficking, and the removal of organs. Suspected cases are referred through the National Referral Mechanism (NRM) alongside a normal safeguarding referral.

4.16. **Operation Encompass –** A statutory information-sharing scheme under which police must notify a student's education setting where they have reasonable grounds to believe the student may be connected to a domestic abuse incident.

4.17. **Private fostering –** An arrangement made privately, without local authority involvement, for the care of a child under 16 (or under 18 if disabled) by someone other than a parent or close relative.

4.18. **Radicalisation –** The process by which a person comes to support terrorism and forms of extremism leading to terrorism.

4.19. **Safeguarding –** See Policy Statement.

4.20. **Safer recruitment –** The set of checks and procedures (DBS, references, identity, right to work) applied to anyone likely to be perceived by students or apprentices as a safe and trustworthy adult.

4.21. **SCR –** Single Central Record. The college's record confirming that required pre-employment checks have been carried out for all staff.

4.22. **Terrorism –** An action that endangers or causes serious violence to a person or people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence the government or intimidate the public for a political, religious, or ideological cause.

4.23. **Virtual School Head (VSH) –** The local authority officer responsible for promoting the educational achievement of children in that authority's care.

4.24. **Young people and vulnerable adults –** See Policy Statement.

5. Roles & responsibilities

5.1. The Principal remains accountable for safeguarding at East Sussex College and is the nominated Designated Safeguarding Lead (DSL). Operational responsibility is delegated to the Assistant Principal Student Experience, who directly leads and supports the Safeguarding Managers.

5.2. The Governing Board appoints a Governor with specific responsibility for Safeguarding and Prevent. This Governor can be contacted by email via the Director of Governance.

5.3. Any concerns about the conduct of staff should be raised with the Director of People.

5.4. Any concerns about the CEO & Principal, the Director of People, or the DSL should be raised with the Chair of the Governing Board, via the Director of Governance.

5.5. Any concerns about a member of the Governing Board should be reported to the DSL.

5.6. Where the DSL is unavailable due to illness, leave, or other circumstances, the Safeguarding Managers ensure safeguarding concerns continue to be received, monitored, and acted upon without delay. When the Safeguarding Managers are unavailable the Wellbeing leads provide cover.

5.7. A full list of designated roles and responsibilities across the college – including the DSL, Deputy DSL, Safeguarding Managers, Campus Support Officers, the Personal Development & Wellbeing team, and campus-specific roles — is set out in Appendix 1.

6. Compliance & monitoring

6.1. This policy and its procedures are reviewed annually, and updated in response to changes in statutory guidance, legislation, or local practice as they arise.

6.2. The DSL is responsible for ensuring that regular reports, at least three times a year, are provided to the Governing Body. These reports cover policies and procedures, data on safeguarding incidents, and training and CPD.

6.3. The Deputy DSL is responsible for ensuring that policies and procedures are up to date, implemented, and effectively delivered, providing quality assurance across the safeguarding team.

6.4. All safeguarding concerns, discussions, decisions, and the reasons for those decisions, are recorded in writing and followed up on ProMonitor, in line with DfE data protection guidance on secure storage, controlled access, and information-sharing.

6.5. Adherence to safeguarding training requirements – induction, annual updates, and DSL-level training – is monitored as set out under Induction & Staff Training above.

7. Related policies/references

7.1. This policy should not be read in isolation: safeguarding and ensuring the safety and welfare of students, 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:

- Acceptable Use of Networks Policy
- Admissions Policy
- Behaviour Management Policy (students)
- Bullying & Harassment Policies for Students & Staff
- Code of Conduct for Staff
- Data Protection Policy
- Disciplinary Policy for Staff
- Diversity, Equity, Inclusion & Belonging Policy

- Health, Safety & Welfare Policy
- Online Safety Policy
- Recruitment & Selection Procedure for Staff
- Safeguarding for Staff at East Sussex College booklet
- Safeguarding Quick Guide
- Talking to Students About Mental Wellbeing booklet
- Trips & Visits Guidance
- Work Placement Policy & Guidance
- Sussex Safeguarding Adults Policy & Procedures

8. Legal & statutory framework

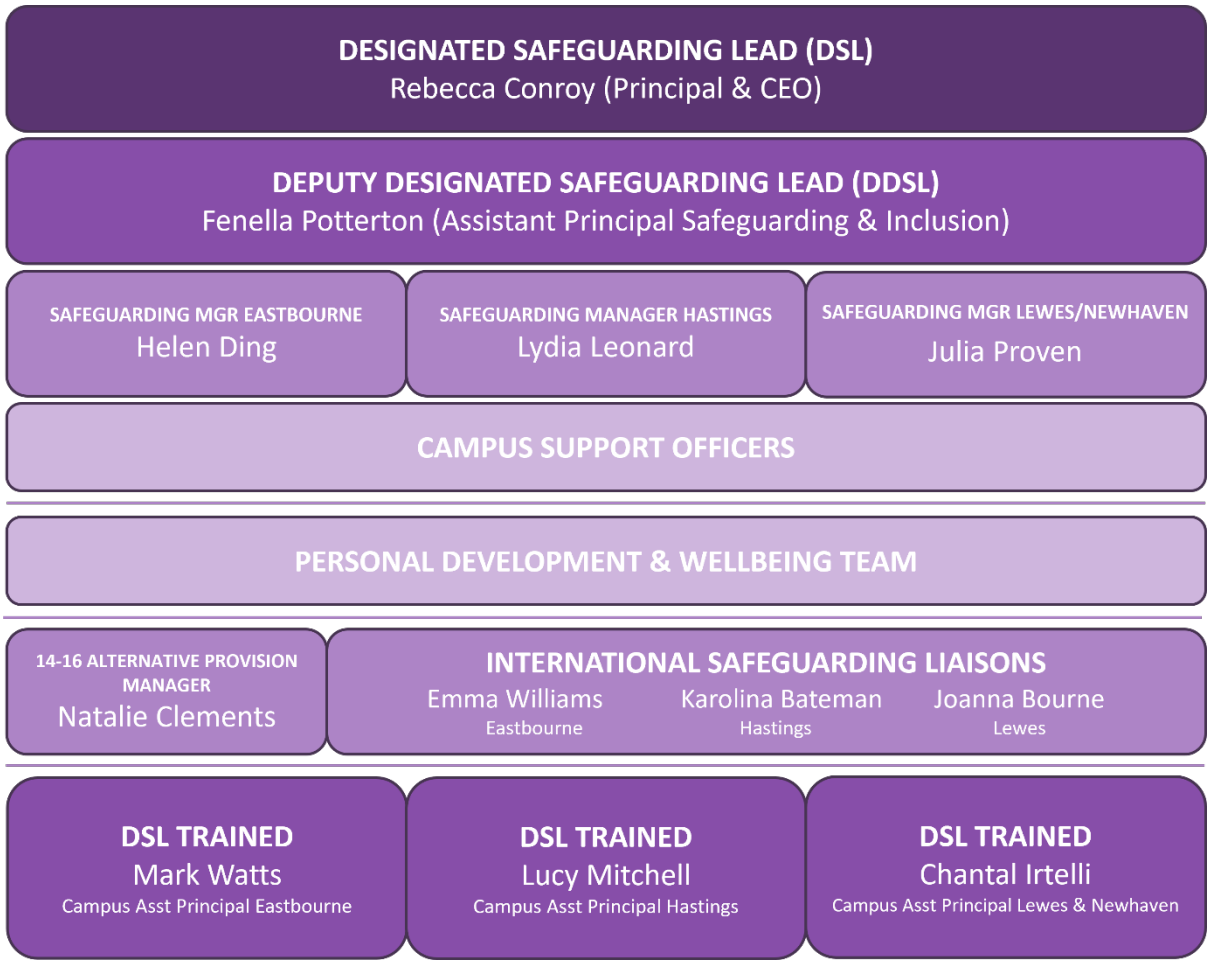
8.1. This policy is developed in line with statutory guidance and legislation including, but not limited to:

- Keeping Children Safe in Education (KCSIE)
- Children Act 1989
- Counter-Terrorism and Security Act 2015 (the Prevent Duty)
- Crime and Policing Act 2026
- Data (Use and Access) Act 2025
- Domestic Abuse Act 2021
- Terrorism Act 2000
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Modern Slavery Act 2015
- Rehabilitation of Offenders Act 1974
- Working Together to Safeguard Children

8.2. Where guidance or legislation is updated, this policy will be reviewed to ensure continued compliance, in line with the review cycle set out in Section 6: Compliance & monitoring.

Appendix 1: Safeguarding structure & responsibilities at East Sussex College

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



Appendix 2: Procedures/Implementation

1. Children who have a social worker

1.1. 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 previously Looked After, in recognition that they remain vulnerable.

1.2. The college also recognises that students with a family member in prison are a similarly recognised vulnerability, statistically more likely to experience absence, mental ill health, and disengagement from education. Staff should apply the same trauma-informed, non-stigmatising approach to supporting these students, without assuming a separate reporting process is required beyond normal safeguarding practice.

2. Children with medical conditions

2.1. Students with a medical condition may face additional safeguarding considerations, particularly where a condition affects their day-to-day functioning, requires ongoing monitoring, or increases their vulnerability to bullying or exclusion.

2.2. Staff should ensure that any known medical needs are recorded and communicated appropriately, in line with the college's Health, Safety & Welfare Policy, Administration of Medication Procedure and the Additional Learning Support & Inclusion Policy, and should raise any safeguarding concern connected to a student's medical condition with the DSL or a Safeguarding Manager in the usual way.

3. County lines

3.1. East Sussex College will work with external agencies to identify young people who are either engaged in, 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.

3.2. 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.

3.3. Information sessions will be delivered to students and apprentices through effective tutorials and/or external agency involvement. Support will be offered to staff, students, and apprentices through the college's safeguarding and wellbeing teams where appropriate.

3.4. Where exploitation of this kind may also constitute modern slavery, a modern slavery referral will be made via the National Referral Mechanism (NRM), alongside the normal safeguarding referral – the two are parallel processes, not alternatives.

3.5. Serious violence – staff should be alert to indicators such as unexplained injuries, a sudden decline in engagement, unexplained possessions, or association with older individuals or groups, which can overlap with county lines and criminal exploitation. Any concern about a student carrying, using, or expressing intent to use a weapon must be reported to the DSL or a Safeguarding Manager immediately, who will assess risk to both the student and others.

4. Domestic abuse

4.1. Domestic abuse can affect students directly, whether they see, hear, or experience its effects at home, or experience abuse within their own relationships (sometimes referred to as teenage relationship abuse). Both are safeguarding concerns, even where a student's own relationship falls outside the legal definition of domestic abuse due to their age.

4.2. Any disclosure or suspicion of domestic abuse affecting a student should be reported to the DSL or a Safeguarding Manager immediately, following the same process as any other safeguarding concern.

4.3. Operation Encompass is a statutory information-sharing scheme under which police must notify a student's education setting where they have reasonable grounds to believe the student may be connected to a domestic abuse incident. The DSL acts as the college's Key Adult for these notifications, and any information received will be used to inform appropriate support for the student, in line with the college's data protection obligations.

5. Duty to refer

5.1. Where a member of staff, volunteer, or contractor is dismissed, removed from a role, or resigns or leaves in circumstances where the college would otherwise have taken such action, because they have harmed or pose a risk of harm to a child, the college has a legal duty to refer them to the Disclosure and Barring Service (DBS). This referral is separate from, and does not replace, any report made to the LADO or the police. The Director of People Services is responsible for this referral.

6. Female genital mutilation (FGM)

6.1. Staff must report any discovery of FGM; this is a legal requirement since October 31, 2015. Concerns about any student or apprentice 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.

7. Gender-questioning students

7.1. The college will treat all students and apprentices with dignity, respect and care. The college will not initiate action regarding social transition, but will respond sensitively and on an individual basis where a student asks for support relating to gender identity or social transition.

7.2. The college will not make assumptions about any student’s experience. Staff will take time to understand the student’s circumstances and, where appropriate, will seek advice from the safeguarding team, Personal Development and Wellbeing Tutors, learning support staff or other relevant professionals.

7.3. In most cases, where the student is under 18, the college will work with parents and carers via the Wellbeing team. If involving parents and carers would create a greater safeguarding risk to the student than not doing so, the Safeguarding Manager/DSL will be involved before contact is made or decisions are taken about next steps.

7.4. Any agreed approach will be considered on a case-by-case basis, recorded, and kept under review. The college will take account of the impact on the student, on other students and on the wider college environment, and will revisit the arrangement if circumstances change.

7.5. Where a student confides that they are questioning their gender but does not ask the college to make any change, staff are not obliged to share this confidence, unless there is a

related safeguarding risk. Some students may already be living openly in their identified gender without others at college being aware of their history; these situations will be handled with care, with the Safeguarding Manager involved as needed.

7.6. Information will only be shared with staff who need to know, and the college will record sensitive decisions and related actions in line with safeguarding and data protection procedures

7.7. The college may consider practical day-to-day arrangements that support the student and fit the needs of the setting, provided they remain safe, respectful and workable for everyone involved.

7.8. Where a request relating to social transition affects participation in single-sex sport, the college will take into account the exception permitted under the Equality Act 2010 for single-sex sporting activity, alongside the best interests of the student and the fairness and safety of other participants.

7.9. Where it is unclear whether a student holds the protected characteristic of gender reassignment under the Equality Act 2010, the college will proceed as though they do, rather than attempting to make that determination itself.

8. Guest speakers & visitors

8.1. 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.

8.2. 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.

8.3. 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.

8.4. 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.

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

9. Hate crimes

9.1. East Sussex 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.

10. Homelessness

10.1. Homelessness, or being at risk of homelessness, is a welfare indicator in its own right. Staff should be alert to signs such as household debt, rent arrears, domestic abuse, or a family being asked to leave a property, and raise any concerns with the DSL or the campus Safeguarding Manager, who will be aware of the referral route into the Local Housing

Authority.

10.2. Referral to the Local Housing Authority runs alongside, and does not replace, a normal safeguarding referral where a student has been harmed or is at risk of harm. Sixteen and seventeen-year-olds living independently from parents or guardians may need a different level of support, coordinated with local authority children's social care.

10.3. Where a student is placed in temporary accommodation, local housing authorities have a duty to notify the college, subject to appropriate consent. The DSL is the college's named recipient for these notifications, and will use the information to ensure timely, informed support is put in place for the student.

11. Induction & staff training

11.1. 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 Deputy DSL, the Safeguarding Managers and the Personal Development & Wellbeing Tutors, and they are asked to read and confirm their understanding of KCSiE Part 1.

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

11.3. Temporary staff and volunteers are asked to read and confirm their understanding of KSCiE Part 1 and are given a copy of this policy.

11.4. 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 DSL 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.

11.5. All staff receive regular safeguarding and child protection updates, including online safety, as required and at least annually. Face to face safeguarding training is delivered to all staff annually and as part of new staff inductions.

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

11.7. Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals. The DSL and DDSL meet regularly with the Safeguarding link governor. Governors should report any safeguarding concerns or incidents to the DSL, Deputy DSL or to one of the Safeguarding Managers.

11.8. Staff should refer to a member of the safeguarding team 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.

11.9. 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.

11.10. The DSL, DDSL or Safeguarding Managers should always be available to discuss safeguarding concerns. If, in exceptional circumstances, none of these staff members are 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.

12. International & ESOL students

12.1. 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, with a strong

focus on the promotion of British values.

12.2. 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.

13. Kinship care & virtual school heads (VSHs)

13.1. For students in kinship care, the college will:

- Liaise with VSHs where appropriate.
- Ensure staff understand the needs and vulnerabilities of children in kinship arrangements.

14. Mental health

14.1. All staff should be aware that mental health difficulties can, in some cases, be a safeguarding concern in their own right, or an indicator that a student is experiencing or at risk of abuse, neglect, or exploitation. This can include self-harm, suicidal ideation, or risk of suicide.

14.2. Staff are not expected to diagnose a mental health condition, but are well placed to notice changes that may indicate a student is struggling, such as: a significant change in behaviour; ongoing difficulty sleeping; withdrawing from social situations; loss of interest in things they usually enjoy; or physical signs of self-harm or self-neglect. Concerns should be raised with the campus Safeguarding Manager.

14.3. Where a concern is also a safeguarding concern, staff should follow normal safeguarding reporting routes and speak to a Safeguarding Manager or the DDSL or DSL. Where a student is in immediate danger, staff should call 999 or arrange for the student to be taken to A&E. For urgent, non-emergency mental health support, staff can direct a student to NHS 111. This should be done with the support of the campus Safeguarding Manager or Wellbeing Lead.

14.4. For further information please refer to the Talking to Students About Mental Wellbeing booklet.

15. Missing children & attendance concerns

15.1. All students and apprentices under 18, or who are vulnerable adults, who go missing or whose 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 student 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.

15.2. The college will:

- Monitor patterns of absence.
- Investigate unexplained or persistent absence as part of safeguarding procedures.
- Work with external agencies where absence may indicate exploitation, abuse, or neglect.

15.3. The college is required by law to report on the attendance of international students to UK Visas and Immigration (UKVI), via the Sponsor Management System. 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.

15.4. 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.

15.5. Unexplained and persistent absence from education can be a 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.

16. Online safety

16.1. 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. Online risks include, but are not limited to, cyberbullying, online harassment, child-on-child abuse, child sexual exploitation, criminal exploitation, radicalisation, fraud, phishing, financially motivated sexual extortion (FMSE), and exposure to harmful content

16.2. Staff will be trained on e-safety practices to protect students, apprentices, and vulnerable adults. This includes identifying and responding to emerging online threats such as disinformation, misinformation, and conspiracy theories. They will also learn to manage their professional online reputation and appropriate online behaviours, as outlined in the Acceptable Use of Networks Policy and Code of Conduct for Staff. 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.

16.3. 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 Acceptable Use of Networks Policy. Special attention will be given to vulnerable students and apprentices. Parents and carers will be supported with information about students' potential online activity outside college.

16.4. The DSL, DDSL and/or Safeguarding Managers 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, risk assessed and managed according to the college's safeguarding and disciplinary policies as appropriate.

16.5. The college uses Smoothwall for filtering and monitoring devices and networks, overseen by safeguarding managers and the IT Services team. These systems are reviewed for effectiveness at least once every academic year, led by the Director of MIS & Digital, with support from the DSL and IT Services, with a record kept of the review. Staff receive training on their roles and responsibilities in relation to filtering and monitoring, and on identifying emerging online threats.

16.6. The college acknowledges the safeguarding implications of generative AI tools. In line with DfE guidance:

- Staff will be informed about responsible use of AI in teaching and learning.
- Risks associated with AI-generated content will be assessed and mitigated, including AI-generated child sexual abuse material and financially motivated sexual extortion (FMSE), in line with national guidance from the National Crime Agency's CEOP Education programme.

- Students will be educated on ethical and safe use of AI technologies.

16.7. Cybercrime – where a student shows signs of drifting into unauthorised computer access, denial-of-service activity, or malware offences, rather than being a victim of online harm, the DSL should consider referral to Cyber Choices, a police-led diversion programme for young people at risk of low-level cyber-dependent offending.

17. Out of hours trips

17.1. KCSiE 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.

17.2. The relevant campus Assistant Principal will be the contact point for this and will liaise with the Deputy Principal as required. For more information please refer to the Trips & Visits Guidance.

18. Parental involvement

18.1. 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 doing so may place the student at greater risk.

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

19. Partner delivery

19.1. 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.

19.2. 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.

19.3. Assessments are made to ensure that the student's wellbeing is safeguarded by 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 are DBS checked and details monitored and updated as necessary.
- All delivery staff are required to complete safeguarding and Prevent training.

19.4. 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).

20. Preventing extremism & radicalisation

20.1. The college maintains a Prevent Risk Register, reviewed termly at the Curriculum, Skills & Quality Committee, covering online and IT-related risk, curriculum and culture, staff knowledge and confidence, safer recruitment, and information-sharing with statutory

partners. The register is owned by named senior leaders against each risk area.

20.2. All staff will complete Prevent training alongside safeguarding training upon induction to the college, receiving regular updates annually and as needed. Staff will recognise that radicalisation is a safeguarding issue and that learners may be vulnerable to grooming, manipulation or exploitation, including online

20.3. 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.
- Recognition that radicalisation is a safeguarding issue and that students may be vulnerable to grooming, manipulation or exploitation, including online
- Parent or carer reports of behavioural changes.

20.4. Staff will also be aware of:

- Local authority and police reports.
- Students and apprentices voicing extremist opinions or glorifying violence.
- Justifying violence to advance a political, religious or ideological cause.
- 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.

21. Private fostering

21.1. There is a mandatory duty to inform the local authority of children in private fostering arrangements.

22. Promoting British values

22.1. In line with the expectations within the Prevent Duty (Counter Terrorism and Security Act 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, apprentices, and staff, embedding them across all areas of college activity.

23. Residential accommodation

23.1. East Sussex College provides residential accommodation for international students at its Lewes campus for students who are 18 and over. Staff working within or visiting residential accommodation are subject to the same safer recruitment checks as staff working elsewhere in the college, and additional safeguarding considerations apply given students are living, not just studying, on site. All residents are provided with an out of hours emergency phone number to call in the event of any incidents. The Health & Safety team conducts regular fire drills and the International Accommodation & Welfare Officer inducts residents into fire safety and evacuation. The college employs a waking night guard who is on duty in the building from 8pm and 8am seven days a week, year-round.

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

24.1. 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 refer to the Disciplinary Policy for Staff for reporting information and process.

25. Safeguarding students aged 14-16

25.1. 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.

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

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

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

25.5. The 14-16 Alternative Provision Manager is fully DSL trained and oversees all students within the 14-16 curriculum.

26. Safer recruitment

26.1. East Sussex College pays full regard to DfE guidance. 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.

26.2. 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 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 & Selection Procedure.

26.3. Host families providing homestay accommodation for international students are subject to the same safeguarding checks as college staff, including DBS checks for all adult household members, and are given safeguarding information and a named college contact before a student's arrival.

26.4. Self-employed individuals working directly with students, for example, self-employed coaches or tutors, are subject to the DBS check appropriate to their role and level of contact with students, consistent with KCSiE.

26.5. 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 or 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, including EEA teacher sanctions and restrictions.
- Check of professional qualifications.
- Prohibition checks for teaching staff.
- Check to establish the person's right to work in the United Kingdom.

26.6. 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.

26.7. 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.

26.8. From 1 September 2026, under the Crime and Policing Act 2026, the previous exemption allowing supervised volunteers to work without an Enhanced DBS check is removed. Any volunteer teaching, training, instructing, caring for, or supervising students or apprentices on more than three days in a 30-day period, or overnight, is in regulated activity regardless of supervision, and must have an Enhanced DBS check with Children's Barred List information before starting. 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.

26.9. 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 behaviour to minimise risk. Staff should avoid, where possible, lone working with a student.

26.10. For further information please refer to the Recruitment & Selection Procedure for Staff.

27. Sexual violence & harassment

27.1. The college follows updated DfE guidance on child-on-child sexual violence and harassment and takes a zero-tolerance approach to this. KCSiE recognises harmful sexual behaviour as a continuum, ranging from early indicators through to sexual harassment and sexual violence, and the college responds to concerns at every point on this continuum rather than waiting for behaviour to escalate. This includes recognising misogyny as an early indicator that can normalise harassment and violence if not challenged. References to "sexting" or "indecent images" involving students under 18 are understood to include "nudes" — images taken by the student or someone else, including AI-generated or digitally altered images and deepfakes.

27.2. The college recognises that victims may not always make a report and that signs of sexual harassment, sexual violence and harmful sexual behaviour may nevertheless be evident to staff. Procedures include:

- Clear reporting routes for disclosures.
- Trauma-informed responses by trained staff.
- Recognition that sexual harassment, sexual violence and harmful sexual behaviour can occur both online and offline.
- Ongoing support for victims and appropriate action for perpetrators.

27.3. For further information please refer to the college's guidance document Reporting Sexual Harassment & Sexual Violence, and the college's statement on preventing and addressing sexual harassment, sexual violence, sexual abuse, and online sexual abuse.

28. Students & apprentices with a learning difficulty or disability

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

28.2. 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, particularly for students with communication support needs.

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

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

29. Work-based learning

29.1. 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.

29.2. 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.

29.3. Following the removal of the regulated activity supervision exemption from 1 September 2026 (see Section 26: Safer Recruitment), employers should be made aware of the DBS check requirements this may create for their own staff supervising students, where contact meets the regulated activity threshold.

29.4. 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.

30. Work experience

30.1. Following the removal of the regulated activity supervision exemption from 1 September 2026 (see Section 26: Safer Recruitment), employers should be made aware of the DBS check requirements this may create for their own staff supervising students, where contact meets the regulated activity threshold.

30.2. 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.

31. Young carers

31.1. A young carer is a student who provides care, assistance, or support to a family member who has a disability, illness, mental health condition, or drug or alcohol dependency. Caring responsibilities can affect a young carer's attendance, wellbeing, and ability to engage fully with college life.

31.2. Staff should be alert to signs that a student may have caring responsibilities – such as persistent tiredness, unexplained absence or lateness, or anxiety about being away from home – and raise any concerns with the DSL or a Safeguarding Manager, who can consider what additional pastoral support may be appropriate.