



## **Safeguarding & Prevent Policy**

**Policy Area:** Safeguarding

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**Policy Owner:** Rebecca Conroy

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**Approved By:** Governing Board

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## 1. Safeguarding is everybody's responsibility

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.

East Sussex College will and 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 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.
- 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 the 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 should go to the Chair of the Governing Board via the Director of Governance.

Following an update from the Education and Skills Funding Agency (ESFA) (September 2017) regarding new safeguarding clauses in the funding agreements and contracts for 2017 to 2018, the college is now required to make the ESFA aware if it is the subject of an investigation by the local authority or the police. The group's Designated Safeguarding Lead will provide the required information by email.

## 2. Policy statement

East Sussex College has a statutory and moral duty to ensure that the college functions with a view to safeguarding and promoting the welfare of young people and adults who are or may become vulnerable and who receive education and training at the college.

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 over the age of 18. The Governing Body recognises that some adults are also vulnerable to abuse, and accordingly the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. Where appropriate, the college will also refer to the [Sussex Safeguarding Adults Policy & Procedures](#).

Safeguarding and promoting the welfare of 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 is part of this definition 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*'.

## 3. Designated staff

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

## 4. Associated safeguarding policies and procedures

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

General Data Protection Policy

Educational Visits & Off-Site Activities Procedures & Guidance

Equity, Diversity & Inclusion Policy

Health, Safety & Welfare Policy

IT Acceptable Use policies

Safeguarding Procedure

Staff Code of Conduct

Online Safety Policy

Bullying & Harassment Policy

Student Management Policy

Student Positive Mental Health & Wellbeing Policy

Work Experience & Placement Policy

## 5. Preventing extremism and radicalisation

All staff will complete PREVENT training alongside Safeguarding training upon induction to the college and received regular annual and when required, updates.

As part of wider safeguarding responsibilities, college staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parent/carer reports of changes in behaviour, friendship or actions and requests for assistance.
- Local authority services, and police reports of issues affecting students in other colleges or settings.
- Students voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths and cultures.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with the college's EDI Policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Making remarks about being at extremist events or rallies outside college.
- The sign in book which reports use of the multi-faith rooms<sup>1</sup>.

## 6. 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. This promotion takes place through:

- Lessons and progress reviews
- The manner in which students are treated by staff
- The election of student representatives and Student Union officers
- The standards of behaviour and respect students are encouraged to adopt through the Student Code of Conduct
- The underlying messages delivered to students at student representative meetings and the Student Union committee meetings
- The displays in classrooms, corridors and across the college
- The manner and consistency with which students' views and behaviours are challenged should they conflict with this<sup>2</sup>.

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<sup>1</sup>The college acknowledges and respects that staff and students hold a variety of faiths and beliefs and therefore provides multi-faith rooms to enable users to pray and reflect during college opening hours. However, the college also recognises that such spaces can, on rare occasions, be used as an opportunity to promote extreme views and to radicalise others. The college therefore monitors the use of these areas by having access arrangements in place for those who wish to use the areas.

<sup>2</sup> Any students displaying such inappropriate behaviours will be reported to the safeguarding managers as appropriate at each individual campus.

## 7. Safer recruitment

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 Safer Recruitment Policy.

As a college online searches of shortlisted candidates may be done as part of pre-recruitment checks.

All staff are issued with the Staff Code of Conduct and professional boundaries form part of the safeguarding element of the corporate induction.

Staff working with under 18s should not place themselves, or their students, 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 Safer Recruitment Policy.

## 8. Induction and staff training

The induction and ongoing training of staff will include the following key aspects:

- Staff understand the difference between a safeguarding concern and a student in immediate danger or at risk of significant harm.
- When concerned about the welfare of a student, staff should always act in the best interests of the young person.
- Staff understand that:
  - Students' poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
  - Students who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health.
  - Mental health issues for students may be an indicator of harm or abuse, or where it is known that a student has suffered harm or abuse this may impact on their mental health, behaviour and education.
  - Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside of these environments. All staff, but especially the DSL (and deputies), should consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
  - Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.
  - The expectations, applicable roles and responsibilities in relation to filtering and monitoring of college devices and our college network.

In addition, all staff should 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.

Our 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.

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

If any 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.

## 9. Guest speakers and visitors

East Sussex College values the opportunities presented by external speakers for students to experience diverse opinion 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 any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably fear, harassment, intimidation or violence.

All visitors are required to report to reception and any organisation requesting to distribute leaflets on campus must seek approval from the college's Assistant Principal prior to distribution. External room bookings by external organisations will be subject to due diligence checks to ensure all activity carried out on college premises is in line with our policies and values.

## 10. 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 14-16 coordinator is Level 3 DSL trained and oversees all students within the 14-16 curriculum.

## 11. Work-based learning

All students 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 where required.

## 12. 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 where required.

## 13. Partner delivery

All students 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 well-being 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 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 the college's premises. As with all safeguarding allegations, we will follow our safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

## 14. 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 Assistant Principal will be the contact point for this and will liaise with the Deputy Principal as required.

## 15. 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.

The International Senior Tutor is Level 3 DSL trained and oversees all students within the international curriculum.

## 16. Students with a learning difficulty or disability

Students with learning difficulties and/or disabilities can face additional safeguarding challenges. The college will ensure that students 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 who have communication support needs.

All relevant college staff working with young people and adults who are or may become vulnerable will receive training which adequately familiarises them with safeguarding young person and adult issues, their responsibilities and the relevant college guidelines and policies. These staff will receive refresher training every year. The college will ensure that in addition there are designated and trained senior management and safeguarding officers; these staff will receive training every year.

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

## 17. 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 provide extra monitoring and pastoral support to mitigate these barriers.

## 18. 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 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.

## 19. When a child is missing or their whereabouts is unknown

All students 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 the 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 missing, 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 upon. The completion of registers is a legal duty for all staff assigned them and this is monitored by managers and any on-completion addressed.

## 20. Parental involvement

The safeguarding team will contact parents/carers of students 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 the safeguarding managers will keep the parent/carer informed of actions and progress.

## 21. Online safety

Online safety covers issues relating to young people as well as adults and their safe use of the internet, smartphones and other electronic communications technologies, both in and out of college. It includes awareness-raising for all members of the college community on risks and responsibilities and is part of the duty of care, which applies to everyone working with young people and vulnerable adults.

All members of staff will be made aware of the importance of good e-safety practice in the learning environment in order to educate and protect the young people and vulnerable adults in their care.

Staff awareness will be raised about managing their own professional reputation online, including how to demonstrate appropriate online behaviours compatible with their role. Personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour will be outlined in the Staff IT Acceptable Use Policy and Staff Code of Conduct. Staff will only use official college-provided email accounts to communicate with students and parents/carers.

Online safety awareness will be part of student induction and embedded throughout the tutorial programme.

Safe and responsible use of the internet and information technology will be reinforced across the curriculum and subject areas. Students will be advised never to give out personal details of any kind which may identify them and/or their location outlined in the Student IT Acceptable Use Policy. Particular attention to online safety education will be given where students are considered to be vulnerable.

The Designated Safeguarding Lead will be informed of any online safety incidents, and any incidents involving child protection or vulnerable adult concerns will then be escalated appropriately. Any material that the college believes is illegal will be reported to appropriate agencies such as Internet Watch Foundation (IWF), Sussex Police or CEOP (Child Exploitation & Online Protection Centre).

The college will record e-safety incidents and manage concerns in accordance with the college's disciplinary policies where appropriate.

As a college we use Smoothwall to support the filtering and monitoring of our college devices and networks which are monitored regularly by the safeguarding managers and IT team. Any cause for concern is dealt with immediately. All staff receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

As a college we review our approach to online safety annually, through the use of the 360 safe website audit tool and guidance from USCIS.

## 22. 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. 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 through effective tutorials and/or external agency involvement.

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

## 23. Appendix 1 – Safeguarding structure at East Sussex College

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

