



Safeguarding Policy

Approved: 7 July 2022 (Corporation)

Review: July 2023 (Annually)

Author: Executive Team Member with Responsibility for Safeguarding

1. Policy Statement

- 1.1 The College is committed to safeguarding and promoting the welfare of its students and staff and expects all members of the College community, including volunteers and visitors to share this commitment.
- 1.2 All students have the right to be safe and feel secure both within the College and whilst engaged in College-related activities including remote learning. The College will ensure that relevant and effective safeguarding practices are implemented and actively promoted. The College will create and maintain a safe and secure environment where students can learn and develop and will encourage students and staff to talk to the appropriate staff about concerns they may have regarding health, safety and welfare.
- 1.3 This policy has been developed to ensure that the College complies with its statutory duties and its responsibilities to safeguard and promote the welfare of children (under 16), young people (16-18) and adult learners.

2. Definitions

- 2.1 The full legal definition of 'regulated activity' is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.
- 2.2 The definition of 'regulated activity' relating to children and young people comprises:
 - a. unsupervised activities: teach, train, instruct, care for or supervise children/young people or provide advice/guidance on well-being, or drive a vehicle only for children/young people
 - b. work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, sixth form colleges, children's homes, childcare premises. This does not include work by supervised volunteers
 - c. relevant personal care, for example washing or dressing or health care by or supervised by a professional
 - d. registered child minding and foster-carers.
 - e. work under (i) or (ii) is regulated activity only if done regularly
- 2.3 The following 'regulated' activities should they be required will lead to an adult being considered vulnerable at the particular time they are in receipt of such activities:
 - providing personal care
 - providing health care
 - providing social work
 - assisting with cash, bills and/or shopping
 - assisting in the conduct of a person's own affairs
 - conveying (not including family, friends or taxi drivers).

3. Scope

- 3.1 All staff at the College, as well as governors, temporary staff, volunteers, agency staff, visitors, contractors and anyone acting on behalf of the College whether paid or unpaid, has responsibility for safeguarding and promoting the health, safety and welfare of students, for ensuring that they are kept safe from harm and for correctly following the College's policies and procedures.
- 3.2 Governors and particular members of the College community have specific responsibilities which are laid out in section 5.0.

4. Policy Aims

- 4.1 To create and maintain an environment in which students and staff feel safe, secure and protected, in which they are listened to and have their views respected.
- 4.2 To ensure, as well as can reasonably be expected, that:
- the risk of harm to students is minimised
 - concerns about the welfare of students are effectively addressed in partnership with other organisations where appropriate
 - students who may be suffering significant harm are identified and responded to appropriately
 - students who may be vulnerable to extreme ideologies are identified, with any concerns effectively addressed in partnership with appropriate organisations
 - the parents of young people or the carers of vulnerable adults have an understanding of the College's safeguarding responsibilities.
- 4.3 To fulfil these obligations by developing, implementing and promoting policies and procedures to:
- prevent unsuitable people working with students
 - ensure active filtering and monitoring of the internet, restricting access to prohibited websites to protect, support and educate stakeholders.
 - promote safe practice and challenge poor and unsafe practice including carrying out appropriate risk assessments on the physical environment
 - stay safe in the event of a firearms, weapons or other violent attack
 - raise awareness of and deal effectively with bullying, harassment, discrimination, radicalisation and extremism and harmful sexual behaviour
 - identify instances where there are grounds for concern about students' safety or well-being and initiate actions to keep them safe
 - contribute to effective partnership working with students and all those involved in providing services for young people and, where appropriate, adults, including the local Children's Safeguarding Board, the local Adult's Safeguarding Board and the 'Channel' programme
 - encourage students to recognise when pressure from others threatens their personal safety and well-being and to develop effective ways of resisting such pressure

- ensure that all staff and governors receive appropriate training and support
- ensure there is effective monitoring and recording of safeguarding and that the responsibilities of governors are fulfilled
- effectively deal with allegations of abuse against staff members, whilst protecting staff from malicious complaints. i.e. HR and LADO.

4.4 In doing the above, the College will:

- work actively with relevant professional agencies who also have responsibility for safeguarding including those agencies that have responsibility for the prevention of radicalisation and extremism.
- value and listen to its students while respecting their rights to make decisions about their own safety and wellbeing unless this is in conflict with statutory duties.
- share information¹ appropriately.
- follow statutory guidance.

5. Roles and Responsibilities

5.1 The Corporation is responsible for ensuring that it complies with its duties under legislation. It must have regard to statutory guidance to ensure that the College has appropriate policies and procedures in place which are effective and comply with the law for safeguarding, child protection, safe recruitment of staff, prevention of radicalisation and extremism, staying safe in the event of a firearms or weapons attack, dealing with allegations of abuse against members of staff, health and safety and confidential reporting (whistleblowing), and that these are monitored and reviewed regularly. The Corporation must ensure that an appropriate senior member of staff is designated to take lead responsibility for child protection issues and that training in effective safeguarding practices is undertaken and regularly updated by all staff and volunteers. The Corporation should have a designated member to oversee the College's safeguarding arrangements. If any deficiencies or weaknesses in regard to safeguarding are brought to the attention of the Corporation, it must ensure that these are remedied without delay.

5.2 The Principal has responsibility for ensuring that the policies and procedures adopted by the Corporation are fully implemented and followed, that sufficient resources are allocated to allow the designated person and other staff to discharge their responsibilities, to ensure that all persons within the scope of the safeguarding policy are able to raise concerns about poor or unsafe practice and that such concerns are addressed sensitively and effectively. The Principal also has a duty to refer to the Disclosure and Barring Service any information about individuals who may pose a risk to children, young people or, where applicable adults. The Principal delegates operational compliance, consistent with statutory guidance in Keeping Children Safe

¹ The Data Protection Act 2018 is not a barrier to sharing information, but is in place to ensure that personal information is shared appropriately.

in Education, to the Assistant Principal SEND and Safeguarding, who is also the Designated Safeguarding Lead.

5.3 The Designated Safeguarding Lead, who is a member of the College Executive group, is responsible for:

- taking the lead responsibility for safeguarding and child protection issues
- being familiar with relevant legislation, national and local safeguarding guidance and referral procedures including referral as required to the local authority children's and adults social care, the Channel programme and the Police
- promoting positive safeguarding procedures and practice, providing support and advice and disseminating good practice in relation to safeguarding
- ensuring that relevant child protection policies and procedures are known and understood and are regularly reviewed
- receiving information about safeguarding concerns, managing disclosures, maintaining secure records and taking appropriate action
- liaising with the Principal and with other agencies, in particular the Local Children's Safeguarding Board
- ensuring appropriate induction and refresher safeguarding and Prevent awareness training and updates at regular intervals for persons within the scope of this policy.

5.4 The Core Safeguarding Team comprises the Assistant Principal SEND and Safeguarding (who is also the Designated Safeguarding Lead), the Safeguarding Manager (who is also the Deputy DSL), the Safeguarding and Wellbeing Officers and the Specialist Administrator for Safeguarding. From time to time, the Deputy DSL will be responsible for assisting the Designated Safeguarding Lead in discharging their duties as outlined above and will deputise during the Designated Safeguarding Lead's absence from College.

The Deputy Principal, together with the Executive Director HR are responsible for compliance in respect of safe recruitment and staff training. As part of this, all senior team personnel who recruit at the College have completed online training in respect of Safer Recruitment.

5.5 All persons within the scope of this policy are responsible for safeguarding and promoting the welfare of students, as appropriate to their role and for correctly following College policies and procedures in relation to safeguarding.

6. Monitoring and Reporting

6.1 This policy will be reviewed annually, in conjunction with the Staff Recruitment and Selection policy and the Prevent policy, and in accordance with relevant guidance and legislation. This annual review is typically in the Autumn to encompass any necessary updates and changes to Keeping Children Safe in Education.

6.2 A safeguarding report will be made termly to lead safeguarding governor, who reports to the governing body. An annual report will be made in the Autumn term to the

Corporation. Annual update training for governors will be delivered on KCSIE and local issues.

7. Linked Statements, Policies and Procedures

- Acceptable Use Policy
- Code of conduct for staff
- Code of conduct for students
- Staff Disciplinary policy and procedures
- Student Disciplinary Policy
- Health, Wellbeing and Fitness to Study policy
- Health and Safety at Work Policy
- Student safety Plan
- Stop and Search Policy
- Disability Statement
- Staff Recruitment and Selection Policy
- Risk Management Procedures
- Prevent (Appendix to this Safeguarding Policy)

8. Further Guidance

- Deputy Principal and Designated Safeguarding Lead Executive
Director HR
- Keeping Children Safe in Education (KCSIE): Statutory Guidance for Schools and Colleges 2022
- Disclosure and Barring Service
<https://www.gov.uk/government/organisations/disclosure-and-barringservice>

Prevent Appendix

1.0 Purpose

It is a fundamental aim of Harlow College that all members of the community feel safe and secure at all times and can go about their study and work routines without fear of any form of intimidation or inappropriate behaviour.

Our College is founded on core values which uphold the importance of a tolerant and democratic society committed to working together. We believe in supporting and nurturing our students to achieve their highest potential but also to enable them to leave us as purposeful, socially responsible members of society able confidently to make their way in life. We want them to embody and uphold the values of democracy; the rule of law; individual liberty; mutual respect and tolerance of those of different faiths and beliefs and those of none.

2.0 Lead Responsibilities

Our Safeguarding procedures are robust and carefully monitored by the Assistant Principal, Safeguarding and Wellbeing, who is the Designated Safeguarding Lead. New staff receive Prevent training as part of their induction and, every year, all staff receive refresher training on this important aspect of College life within the statutory KCSIE update training. A Safeguarding Report is presented annually to the Corporation, this includes reporting on Prevent and any activity under Prevent. Termly reports shared with lead governor.

3.0 The Statutory Context

Counter Terrorism and Border Control Act 2019 and Section 26 of *The Counter Terrorism and Security Act 2015* places a duty on schools and Colleges in England (and Wales) to prevent people being drawn into terrorism. This duty is communicated through guidance for all Further Education Colleges. This guidance, the [Prevent duty guidance for further education institutions in England and Wales](#), was last updated on 1 April 2021 and this Policy reflects that guidance.

School and College leaders (including governors) must:

- establish or use existing mechanisms for understanding the risk of extremism
- ensure staff understand the risk and build capabilities to deal with it
- communicate and promote the importance of the duty
- ensure staff implement the duty effectively Other duties on Colleges include:
- effective partnership working with other local agencies, e.g. LSCB, police, health, etc.
- information sharing
- maintaining appropriate records
- assessing local risk of all forms of extremist ideology
- demonstrating who are protecting children
- developing clear protocols for visiting speakers
- safeguarding policies that take account of LSCB policies and procedures
- training staff to give them knowledge and confidence
- ensuring there are robust ICT protocols that filter out extremist materials, to signpost and educate all stakeholders on appropriate IT usage
- college buildings must not be used to give a platform to extremists

Ofsted are responsible for monitoring how well college are implementing this duty.

4.0 College Prevent Policy

This policy has been written to ensure the College's compliance with the Counter Terrorism and Security Act 2014 (Last updated 12 February 2015). The key features of our compliance are recorded under the following headings:

- i. Identification of Risk.
- ii. The Education of Tolerance
- iii. Curriculum
- iv. Pastoral
- v. Use of College Premises/Lettings
- vi. Visitors

4.1 Identification of Risk

In addition to the Prevent Policy, the College has policies on Equality and Diversity, Health and Safety and Safeguarding all of which are reviewed annually. All members of the College community take very seriously the need to ensure we do all we can to prevent our students being drawn into terrorism or becoming radicalised into any forms of extremism.

- 4.1.1 The student body is drawn from a large geographical area who study across a range of levels and subject areas. All students are supported by a Learner Mentor who meets regularly with all of their learners and provides a safe forum for discussion and sharing of any concerns.

This is supplemented throughout the year by one to one sessions which again provide an opportunity for students to talk openly and honestly about their academic progress and any personal/pastoral/welfare concerns they might be experiencing. Tutors meet regularly with their line managers and this forum is open for specific discussions on students who may be causing concern. In addition, concerns may be raised through the Safeguarding and Wellbeing Team.

Students for whom concerns are identified are notified to the Safeguarding and Wellbeing Team who meet regularly to discuss safeguarding issues.

- 4.1.2 All senior managers of the College are aware of the Prevent and Channel programmes in order to protect the welfare of the whole College community in relation to the issues that are linked to radicalisation and the dangers of terrorism and extremism.
- 4.1.3 The Assistant Principal, SEND and Safeguarding, is the Prevent Liaison Officer. They have the contacts of the regional FE and HE Prevent Coordinator and she and members of the Safeguarding Team meet with the local police liaison officer as well as attending Eastern Regions CPLT meetings as appropriate. The Assistant Principal, SEND and Safeguarding, receives a copy of the quarterly regional Counter Terrorism Local Profiles Presentation.
- 4.1.4 All staff at Harlow College are routinely reminded of their duty to be vigilant whilst working in College and to report anything that they would consider to be unusual behaviour to their line manager or to a member of the Safeguarding Team for immediate investigation.

4.1.5 Statement re: Firewall and any ESafe Monitor and Educate:

Filtering systems are in place which identify, block and reports on attempted access to restricted websites by any college users whilst using college Wi-Fi.

Stakeholders are signposted to UK Safer Internet Centre

4.1.6 Appropriate records about any Prevent-related concerns are made and securely kept by the Safeguarding and Wellbeing Team. The Assistant Principal, SEND and Safeguarding takes the lead on reporting on Prevent to College Executive and governors and any Prevent activity is recorded in the annual Safeguarding report to governors and reported to lead governor at termly meetings.

4.1.7 Risk based action plans are created on a case by case basis in response to any indication of extremist thinking or ideology from a student and followed through appropriately either by the student's teaching team, Head of Academy or other senior manager.

4.1.8 All tutorial and teaching staff are expected to be vigilant, to observe their classes carefully and to report anything that is a cause for concern to the Safeguarding and Wellbeing Team – awareness is covered in Induction

4.2 The Education of Tolerance

All students have the opportunity to celebrate appropriately their own significant religious festivals. Religious festivals and culturally important occasions are highlighted through social media and the college website available to all stakeholders

4.2.1 The College has a Quiet / Contemplation Room which is located in UCH Building.

All students receive tutorials on equality and diversity each year as part of their tutorial programme which highlights the importance to all faith traditions of tolerance and mutual respect.

4.3 Curriculum

The Curriculum at Harlow College is wide and varied and crosses levels from PreEntry to Level 5. The college tutorial PADLET wall clearly signposts opportunities to celebrate diversity and to emphasise the importance of respect and tolerance towards one another.

Teaching staff who observe anything untoward during a lesson are expected to report it to the Safeguarding Team.

4.4 Pastoral

Harlow College has an effective pastoral structure that supports the varied needs of our student body. The Safeguarding and Wellbeing Team comprises an experienced team of individuals led by the Assistant Principal, SEND and Safeguarding and College Chaplain.

4.4.1 All staff, pastoral and academic, receive training on contributory factors that make young people vulnerable to being drawn into extremism. Students receive information sessions during tutorial on radicalisation and extremism, plus a session covering online safety which includes appropriate use of the internet and safeguarding against terrorist/extremist material on-line. Staff also understand how to challenge extremist ideas which are used by terrorist

groups and purport to legitimise terrorism. Staff continue to have training, on contextual safeguarding themes as appropriate, to develop their ability to identify students who are vulnerable or at risk of radicalisation.

4.5 Training

Members of the safeguarding team are trained to have an effective understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity.

4.5.1 All student-facing members of staff are trained to recognise extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. Such staff have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response. This will include an understanding of when to make referrals to safeguarding team members for onward referral to the Channel programme and where to get additional advice and support.

5.0 Use of College Premises/Lettings

The College has a number of external lettings and these are carefully vetted in advance by the Campus Operations Manager.

6.0 Visitors to the College

All visitors must be notified to the Reception team via the College Diary and visitors are required to report to reception on arrival. They are required to sign into the college Inventory system which produces a paper visitor's badge that must be worn throughout their visit and which is then used to sign the visitor out of college on departure. Those that are coming to the College for a longer period of time and any who have regular unsupervised contact with students must have appropriate checks and hold an enhanced DBS check. We request that any individual visiting the College as a speaker addressing students is checked in advance of their arrival to ensure that the content of their speech is appropriate.

Linked Policies and Procedures:

- Access and Participation Statement
- Health and Safety Policy
- DBS Check Policy
- Contemplation Room Guidelines
- Safeguarding Policy
- Prevent action plan

7.0 Further Guidance

- [National Counter Terrorism Security Office](#)
- [Prevent duty guidance for further education institutions in England and Wales](#)

TRACKING and REFERENCE INFORMATION

Date Approved: 7 July 2022 (Corporation)

Review Date: July 2023 (Annually)

Author/Responsibility: Executive Members with Responsibility for Safeguarding

Equality Impact Assessment: 11 December 2019

List of related policies, procedures and other documents:

- Acceptable Use Policy
- Code of conduct for staff
- Code of conduct for students
- Staff Disciplinary policy and procedures
- Student Disciplinary Policy
- Health, Wellbeing and Fitness to Study policy
- Health and Safety at Work Policy
- Student Protection Plan
- Prevent policy
- Stop and Search Policy
- Disability Statement
- Staff Recruitment and Selection Policy
- Risk Management Policy
- Prevent Policy (addendum to Safeguarding Policy)

Complaints: If you wish to submit a complaint about the application of this policy or the procedure of it, please send your request in accordance with the provisions of the Grievance Procedure.

Monitoring: The application of this policy and associated procedure will be monitored by the Senior Manager with Responsibility for Safeguarding

Easy reading: To receive this policy/procedure in a different format, please contact HR Services