



Harlow College Safeguarding and Prevent Policy

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SAFEGUARDING POLICY

1 Scope and Purpose

Harlow College is committed to prioritising and promoting safeguarding and to protecting children, young people and vulnerable adults from harm.

The term 'safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people safe (reference to children means those under the age of 18; vulnerable under 25 in line with SET procedures July 2019). Therefore safeguarding encompasses student health and safety, preventing and dealing with abuse, bullying, meeting the medical needs of those with medical conditions, providing first aid, security (including e-safety), safeguarding from drugs, substance and alcohol abuse.

'Safeguarding and promoting the welfare of children' is defined as:

- Protection from abuse and neglect;
- Ensuring safety and care;
- Ensuring optimum life chances;
- Promotion of health and development;
- Having due regard to the prevention of young people becoming radicalised or drawn into extremist or drug related activity.

Harlow College has clearly defined responsibilities under the Children and Families Act 2014 and Keeping Children Safe in Education – Statutory Guidance September 2019 for students aged under 18. The College extends these responsibilities, within the scope of this policy, to students with learning difficulties, irrespective of age, if they are vulnerable to abuse as a result of their learning difficulty. The policy also applies to people enrolled as students of Harlow College or for whom the College has accepted a responsibility for care.

This policy applies to all groups regardless of age, disability, gender, marital status, parental responsibilities, sexuality, race, religion and gender re-alignment and it is the duty of all staff, governors, students, visitors and contractors to follow it. This was rolled out via the new SAFEGUARD software system recently adopted by Harlow College.

In March 2020, the College moved to a remote learning approach following Government guidelines in response to the Covid-19 pandemic. In line with local Safeguarding Board advice we have reflected the changes to our College safeguarding approach, details of which can be found in Appendix 2 on page 20. We continue to follow Essex Safeguarding Board advice to monitor our practice and ensure it follows the legislative requirements of the 'Keeping Children Safe in Education' duties.

1.1 Key Principles

The following principles underpin all of our work with young people and vulnerable adults. Our approach will:

- be measured by its effectiveness;
- be learner-centred;

- actively involve students and their families where possible;
- support the achievement of best possible outcomes for students;
- be holistic in approach;
- ensure equality of opportunity;
- be multi/ inter-agency in approach;
- be a continuing process rather than an event;
- identify and provide the service required and to monitor the impact of provision on a student's progress.

1.2 Helping Students to keep themselves safe

- 1.2.1 Students will be advised about College procedures in relation to safeguarding as part of their induction into the College, via the VLE, via the College tutorial curriculum and by periodic targeted poster campaigns. The College will provide students with reminders about who to contact should they have a safeguarding concern.
- 1.2.2 Students will be advised about health and safety procedures to ensure that they know how to stay safe within the College environment; whilst undertaking practical activities and when on placement.
- 1.2.3 Students will be provided with guidelines about keeping themselves safe on- line as part of their induction into using the College's IT network.
- 1.2.4 Students attend and participate in activities designed to raise awareness of issues and concerns which may impact on the ability of the learner to keep themselves safe as part of the group tutorial provision. These include e-safety, sexual health and exploitation, drugs and alcohol awareness, domestic violence, crime, anti-bullying, equality and diversity emotional resilience and the dangers of being drawn into extremism or radicalisation. These activities are aimed at different levels and abilities to enable all students to participate.

1.3 Promoting the Welfare of Children, Young People and Adults at risk

We recognise that because of the day to day contact with young people, staff are well placed to observe the outward signs of abuse. Harlow College will therefore:

- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to.
- Ensure that young people and vulnerable adults know that there are adults in the College whom they could approach if they are worried.
- Include opportunities in the curriculum (tutorial) for young people/ vulnerable adults to develop the skills they need to recognise and stay safe from abuse.

1.4 Definitions of Abuse and Neglect

Abuse is a form of maltreatment. A learner may be abused or neglected by having harm inflicted upon them or by a person failing to act to prevent harm. Students may indirectly or directly witness, or be subject to such forms of abuse. Domestic abuse – can involve learners witnessing but can also include child to parent abuse, the dramatic increase of reported C to P abuse

The College recognises the following definitions with regard to abuse, neglect and harm:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of failure to prevent injury occurring. It can also occur when a parent or carer fabricates the symptoms of ill health or deliberately causes ill health to the child, young person or vulnerable adult who they are looking after.

Emotional abuse is persistent emotional ill-treatment such as to cause severe and persistent adverse effects on emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmental inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capacity as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse involves a child, a young person, or vulnerable adult being allowed, forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts. They may involve non-contact activities such as involving children in looking at or in the production of pornographic material, watching sexual activities or encouraging children to behave in a sexually inappropriate way or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children, including peer on peer abuse

Neglect is defined as the persistent or severe failure to meet basic physical or psychological needs. Neglect is likely to result in a physical impairment of the individual's health or impairment. It may involve a failure to provide adequate food, clothing or shelter and failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. A child going missing from education (failing to attend with no reason given) is also a potential indicator of neglect or abuse especially on repeat occasions.

Where specific safeguarding issues arise, expert and professional organisations will be contacted to provide up to date guidance and practical support. These will include Relevant local social care, the ESCB (Essex Safeguarding Children Team), the Police, substance abuse support agencies (EYPDAS, ADAS and CDAT), mental health and wellbeing support agencies (EWMHS, MIND IAPT and YCT) and housing charities.

These specific issues could relate to:

- Child sexual exploitation;
- Sexual assault;
- Bullying, including cyberbullying;

- Homelessness and vulnerable housing issues;
- Domestic violence;
- Drug and Alcohol related issues;
- Honour-based crime including Forced Marriage;
- Female genital mutilation;
- Gangs and youth violence;
- Gender-based violence/ violence against women and girls (VAWG);
- Mental health;
- Private fostering;
- Extremism and radicalisation;
- Sexting;
- Teenage relationship abuse;
- Human Trafficking.

1.5 Learner Behaviour and Equality of Opportunity

Harlow College recognises that young people/ vulnerable adults who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helpless and humiliated and they may experience some sense of responsibility or blame. College may be the only stable, secure and predictable element in the lives of young people at risk. When at College their behaviour may be challenging and defiant or they may be withdrawn. Therefore the College will endeavour to support the young person by ensuring that:

- The College ethos promotes a positive, supportive and secure environment and gives students a sense of being valued.
- The College expectations of student behaviour are aimed at supporting vulnerable students in the College. The College will ensure that students know that certain behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred towards them.
- The College liaises with other agencies that support the learner such as Essex and Hertfordshire Social Care, the ESCB (Essex Safeguarding Children Team), the Police, substance abuse support agencies (EYPDAS, ADAS and CDAT), mental well-being support agencies (EWMHS, MIND IAPT and YCT) and housing charities. Local Multi-Agency Stay Safe group that includes many local stakeholders include Housing, Police, Harlow College (Marian Hollingsworth) NHS, YOT/Probation Service.
- Statutory policies that are relevant to safeguarding and prevent duties and promoting the welfare of young people are implemented and reviewed.

2 Process/Procedure

2.1 Framework

This policy has been developed in accordance with the principles established within the statutory guidance 'Keeping children safe in education' September 2019, ESCB (Essex Safeguarding Children Team) procedures and the requirements of the Prevent statutory duty.

The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) merged in Dec 2012 to become the Disclosure and Barring Service (DBS). CRB checks are now called DBS checks. The College will operate within the guidelines of the Code of Practice and explanatory Guide for Registered Persons and other recipients of Disclosure Information, issued by the Disclosure & Barring Service. The Disclosure and Barring Service (DBS) requires employers to complete the DBS application for all employees who regularly come into contact with children and vulnerable adults and Harlow College maintains an up-to-date register of contractors working on campus. Reviewed as requested by HR Policies

The College recognises that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our students and staff from harm, and that everyone's welfare is our paramount concern.

All staff have a role in providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual learner. To this end, safeguarding is considered to be "everybody's responsibility".

2.2 The aims of this Policy are:

- To support the development of all students in ways that will foster security, confidence and independence.
- To provide an environment where students feel safe, secure, valued, respected, and feel confident, knowing how to approach staff within the College if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and support staff of the need to safeguard young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring young persons and vulnerable adults known or thought to be at risk of harm, and to ensure we, the College, contribute to assessments of need and support packages for them.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the College that will be followed by all members of the College community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Local Authority, the Local Safeguarding Children Team, the Youth Offending Team, the Police and Social Care.
- To ensure that all staff working within our College who have substantial access to children and vulnerable adults have been checked as to their suitability, including verification of their identity, qualifications, and a robust vetting policy aligned to the DBS process and a single central record of checks is maintained.

3.0 Implementation

The College will follow the guidelines set out by DfE and the ESCB. In particular, the College will:

- Have a named person as the Designated Safeguarding Officer (DSO), that person being the Assistant Principal – Student Services.

- Have a named DDSO, that person being the Director for Safeguarding and SEND.
- Ensure that all staff are aware of their individual responsibility for the protection of children and vulnerable adults in their care and that they are aware of the name and the role of the DSO.
- Arrange basic training for all staff in child abuse awareness that will include what to do if they are worried about a child or vulnerable adult and how to respond to a child or vulnerable adult who tells them about abuse.
- Establish an effective, accurate record-keeping system to monitor all students about whom concerns have been expressed, whether or not these concerns lead to a child protection referral. These records will be held electronically, externally encrypted by SAFEGUARD in a secure drive, with access limited to the safeguarding team. The data collection will comply with GDPR legislation.
- Ensure that clearance is received from the Disclosure and Barring Service (DBS) service for all staff who may, in the course of their work, be alone with a learner.
- Develop effective links with other agencies and will contribute to inter-agency enquiries, child protection conferences, common assessments framework meetings and other related groups as appropriate.
- Publish the College's responsibilities for safeguarding and the protection of children and vulnerable adults in student handbooks, College website and information to staff and parent/ carers.
- Fulfil any special responsibilities or task required in the care of children on the child protection register.
- Ensure all members of staff are provided with safeguarding and child protection awareness at induction.
- Ensure all members of staff are provided with regular refresher training.
- Ensure that child protection type concerns or allegations against adults working in College are referred to the Local Authority Designated Officer (LADO) for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring, following resignation, dismissal, or when we cease to use their service in the case of a volunteer.

The DSO & DDSO will be trained and supported in the task of overseeing all child protection matters within the College. All members of the Safeguarding team will undertake Level 2 Safeguarding training and will update training every two years. The DSO & DDSO and members of the Tier 1 Safeguarding team will be trained to Level 3, updated every 2 years.

The College undertakes to adhere to the requirements of the ESCB when referring students in need of multi-agency support.

4.0 Confidentiality

In all dealings with students who are disclosing matters that may require action or intervention, staff are made aware that we do not promise to keep information confidential between the staff member and the student – students are made aware that information shared with the members of staff will be acted upon and shared with other agencies at need.

Members of the Safeguarding Team who have access to confidential or restricted information will disclose information about a learner to other members of staff on a 'need to know' basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children, young people and vulnerable adults.

All staff must be aware that they cannot promise a young person to keep secrets that might compromise the young person's safety or wellbeing or that of others who may be at risk. We will always undertake to share our intention to refer a young person to Social Care with their parent/ carers unless to do so could put the young person at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with one of the ESCB team or contact Social Care via the consultation line.

5.0 Supporting Staff

We recognise that staff working in the College who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSO & DDSO, HR Manager and/ or their immediate line manager, and to seek further support as appropriate.

Members of the Tier 1 Safeguarding Team will have regular monthly access to supervision sessions with a trained professional.

6.0 Roles and Responsibilities

The Governing Body of Harlow College recognises that under section 175 (section 157 for the Independent sector) of the Education Act 2002, it has a statutory duty to make arrangements to ensure all its functions are discharged with regard to safeguarding and promoting the welfare of young people.

The Governing Body recognises that the Local Authority and the Local Safeguarding Children Team has a statutory responsibility to monitor schools'/ FE Colleges' compliance with the statutory guidance.

6.1 Role of Governing Body

To ensure compliance with our legal duties, the Governing Body has nominated a Designated Governor for Safeguarding & Child & Vulnerable Adult Protection who

- works with the DSO to ensure that fellow governors have a clear understanding of their duties with regard to safeguarding.
- liaises with the DSO and the Principal.

The Governing Body executes its duty to ensure that the policies, procedure and training at Harlow College are effective and comply with the law at all times by:

- Delegating operational responsibility to the Principal for the purpose of safeguarding and promoting the welfare of children receiving education or training at Harlow College.
- Giving scrutiny to regular reports provided by the Safeguarding Manager: this annual report provides an update on the College Safeguarding action plan and details numbers and types of incidents and concerns which have arisen, along with updates from the counselling service, health & safety and HR (recruitment and staff training).
- Remedying any deficiencies or weaknesses in safeguarding arrangements without delay.
- Ensuring that Harlow College has a safeguarding policy and procedures which are updated annually and satisfy statutory requirements as outlined in 'Keeping Children Safe in Education' September 2019.
- Ensuring that Harlow College has a staff code of conduct which provides staff/volunteers with clear guidelines about expected behaviour and handling of allegations made against staff/volunteers and that complies with ESCB procedures. The code of conduct should balance the need to protect children whilst protecting staff/ volunteers from false/unfounded accusations.
- Ensuring that a Student Safeguarding Manager is appointed to lead on safeguarding, to advise/support staff and to liaise with the LA and other agencies. He/she will have status/authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
- In addition, the Chair of Governors is nominated to be responsible for liaising with partner agencies, as appropriate, in the event of the allegation of abuse being made against the Principal.

6.2 The Role of the Principal

The Principal will ensure, through the Senior Management Team and the Safeguarding Team, that:

- Policies and procedures are fully implemented and followed by all staff.
- Sufficient resources and time are allocated so that the DSO & DDSO and staff can attend strategy discussions, inter-agency meetings, contribute to assessments etc.
- Staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with whistle blowing policies.
- Policy/procedures are available to parents/carers on request.
- Safer recruitment is adhered to and checks on new staff and volunteers carried out.
- Cases are reported to the Disclosure and Barring Service (DBS) if a person ceases to work in an education setting and there are grounds for believing he/she may be unsuitable to work with children, or may have committed misconduct.

6.3 Role of Director of SEND and Safeguarding supported by the Safeguarding Manager and Safeguarding Team

The Director of SEND and Safeguarding will:

- Deputise to the DSO in the implementation of College policy and procedures.
- Oversee and review the Harlow College Safeguarding Policy and Procedures including linked policies.

- Raise awareness of developments in Safeguarding good practice and regularly update staff on emerging local and national issues.
- Ensure the quality assurance of provision of safeguarding information, advice and guidance.
- Ensure compliance with national standards and ESCB guidance through annual audits.
- Monitor the staff training record alongside the HR Department.
- Develop initiatives which maintain the highest profile for Safeguarding in the work of the College and its partners.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with managers to inform of any issues/ ongoing investigations, and ensure there is always cover for the role.
- Arrange training in how to recognise signs of abuse, and when it is appropriate to make a referral.
- Use working knowledge in how Local Safeguarding Children Team's (LSCB) work, the conduct of case conferences, and be able to attend and contribute to these when necessary.
- Ensure all staff have access to and understand the College Safeguarding Policy.
- Ensure all staff have induction training and are able to recognise and report any concern as they arise.
- Ensure that detailed, accurate and secure electronic SAFEGUARD records of referrals/concerns are kept.
- Have access to resources and attend relevant or refresher training courses at least every 2 years.
- Ensure the Safeguarding Policy is updated and reviewed annually by the Safeguarding Team and Governors.
- Ensure students/ parents/ carers see copies of the Safeguarding Policy, which alerts them to the fact that referrals may be made, and the role of Harlow College.
- Where a young person leaves Harlow College and progresses or transfers within an educational establishment, ensure that file/information is transferred to the new establishment.
- Refer a child if there are concerns about possible abuse, via the relevant referral process and acting as a focal point for staff to discuss concerns. Referrals should be made via the electronic SAFEGUARD system that all staff have personal access to and a response will be returned.
- Keep chronological records of concerns about a child even if there is no need to make an immediate referral.
- Ensure that all such records are kept confidentially and securely, separate from learner records, until the young person's 25th birthday and are copied on to their next education provider – 50 years for CSE/A.
- Ensure that an indication of further record-keeping is marked on the learner records.
- Liaise with other agencies and professionals as necessary and appropriate.
- Ensure that either they or an appropriate Deputy attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report which has been shared with the parent/carers.

- Ensure that any learner currently with a child protection plan who is absent without explanation for two days is referred to their key worker's Social Care Team.
- Provide an annual report for the Governing Body, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Governors; number and type of incidents/ cases, and number of children with child protection plans (anonymised).

6.4 Role of Designated Safeguarding Officer

The Designated Safeguarding Officer (DSO) is the Assistant Principal – Student Services.

The DSO will oversee all of the actions and operations of the Student Safeguarding Manager and the wider Safeguarding Team and will liaise with Exec and Governors on all safeguarding matters arising on campus. The DDSO will fully deputise for the DSO in all matters

6.5 Role of All Staff and Duty of Care

Staff must:

- prioritise safeguarding and adopt a preventative approach in all engagements with learners.
- promote a safe environment for students.
- identify students who are experiencing or are likely to experience significant harm.
- Identify students who they consider may be in danger of becoming radicalised or engaging in extremist activity or county line activities.
- seek assistance from the DSO when appropriate as stated in the Safeguarding Policy.
- promote the welfare of young people and vulnerable adults.
- promote the ethos of the College that students feel secure, valued and listened to.
- promote learner health and safety at induction and throughout their period of study.
- access first aid/medical resources when required.
- promote learners' well-being via participation in the tutorial curriculum.
- recognise students experiencing distress and act to support including seeking advice from the Safeguarding Team.
- challenge inappropriate behaviour on campus e.g. bullying, substance misuse and to refer to relevant College policies to ensure correct procedures are followed including Stop & Search protocols.

Duty of Care

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and young people from discrimination and avoidable harm

Staff should develop respectful, caring and professional relationships between themselves and young people. Staff behaviour should demonstrate integrity, maturity and good judgement. e.g. management of risk in external visits/residential visits and fully comply with the Staff Code of Conduct.

7.0 Students Who May Pose a Risk

Where a learner's history indicates that they pose a risk to other students or staff or is in need of some form of protection, a risk assessment must be undertaken prior to enrolment. This will establish whether College is an appropriate environment for that person, and if so, what arrangements can be put in place to support that person to ensure the safety of others and their own safety. Information received from other agencies will inform the risk assessment. Recommendation is given to a Safeguarding Team Panel meeting as deemed appropriate given the profile of the individual concerned. In some circumstances, it may be deemed not appropriate for the learner to enrol at College at a particular time. The College will adhere to its Admissions Policy.

8.0 Staff Training

All staff will receive adequate training to familiarise themselves with safeguarding issues and responsibilities.

Key messages for staff are:

- Child abuse can affect any young person, and may be carried out by anyone. It is usually carried out by someone well known to the young person.
- Safeguarding is everyone's responsibility.
- Abuse has a profound emotional and/ or physical effect on the young person, the family and the wider community.
- All people who work with young people need to know of their responsibilities.
- Some groups of young people seem to have an increased risk of abuse, for example, looked after children, children with disabilities or children living in stressful, violent or chaotic situation.
- Being alert to signs which may indicate abuse.
- Keeping up to date with legislation and guidance.
- The importance of working together on campus and with external agencies.
- Being aware that domestic violence can be witnessed or perpetrated by learners.
- Being aware that learners are prime candidates for county line activities.

9.0 Associated Safeguarding Procedures

The Safeguarding Policy is supported by a set of procedures which include:

- Safer recruitment and employment;
- DBS registration of contractors/ self-employed people;
- Responding to an allegation/ disclosure of abuse;
- Responding to an allegation/ disclosure against a member of staff;
- Responding to an allegation/ disclosure in the evening;
- Responding to an allegation/ disclosure of bullying;
- Responding to a concern of self-harm;
- Responding to concerns about risk-taking behaviour including use of alcohol and drugs;
- Prevent Procedure.

9.1 Whistleblowing

We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff and students should be aware of their duty to raise concerns, where they exist, about the management of child protection and the protection of vulnerable adults, which may include the attitude or actions of colleagues, and are encouraged to do so.

9.2 Physical Intervention

We understand that physical intervention may be required where a learner, staff member or visitor may be at risk but understand that physical intervention of a nature which causes injury or distress may be considered under child/vulnerable adult protection or disciplinary procedures.

9.3 Bullying

Our procedure on bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under safeguarding/child protection procedures. This includes cyber, racist, homophobic and gender-related bullying.

9.4 Racist Incidents/Hate Crime

The College takes allegations of racism seriously and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding/child protection procedures.

9.5 Prevention

We recognise that the College plays a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- Work to establish and maintain an ethos where children, young people and vulnerable adults, feel secure and are encouraged to talk and are always listened to.
- Ensure that all children, young people and vulnerable adults in the College know who they can approach if they are worried or in difficulty.
- Include across the curriculum and tutorials, opportunities which equip young people with the skills they need to stay safe from harm and to know to whom they should turn for help.

9.6 Health & Safety

Our Health, Safety and Welfare at Work Policy, set out in a separate document, reflects the consideration we give to the safety and security of our students both within the College

environment, and when away from the College when undertaking College placements and educational visits.

Staff may be made aware that a child or vulnerable adult may have been abused through an incident being relayed to them by a learner or by another person, or from their own observations.

All complaints, allegations or suspicions of abuse shall be taken seriously. However, staff should not investigate suspected incidents since this may contaminate evidence in a future investigation by the Police or Social services. The Police or Social services who are specially trained in this area take responsibility for investigations.

Where safeguarding concerns have an impact on the student being able to commence or complete a programme of study, a Safeguarding Panel meeting will be convened. The Health & Safety team will, in conjunction with the Safeguarding team (Safeguarding Team members) review the issues and produce a safeguarding risk assessment if the student is to commence or continue with their study.

10.0 Associated Documents

This policy should be read alongside the following policies and protocols: -

- The College Charter;
- The Equality and Diversity Policy and Procedure;
- The Health, Safety and Welfare at Work Policy;
- The Risk Assessment Procedure;
- The Workplace Vetting Procedure;
- The Data Protection Policy;
- The Acceptable Use Policy (AUP);
- The Student Code of Conduct and Disciplinary Procedure;
- The Staff Code of Conduct and Disciplinary Procedure;
- The College Complaints Procedure;
- Staff Recruitment and Selection Policy;
- Admissions Policy;
- Teaching and Learning Policy;
- Public Disclosure Policy;
- Prevent Procedure and Action Plan at Harlow College;
- Prevent and Channel Procedures.

11.0 Equality Impact Assessment

It is intended that this Policy is fair to all. Where any part could potentially lead to unequal outcomes, the policy then justifies why this is a proportionate means of achieving a legitimate aim.

PREVENT Procedure: Detecting and Preventing Radicalisation and Extremism

Background

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to prevent the radicalisation of people and to stop people moving from extremism into terrorist-related activity.

Context

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. As an organisation that interacts with young people, Harlow College ensures that staff and students are aware of these risks and are familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

The College Procedure

The College has developed internal support mechanisms and referral procedures. This procedure outlines who staff and students should contact with any concerns about fellow staff or students. The College has developed links with external agencies that provide training and support. If, once internal processes are completed, it is considered that additional external support or referral is required, this will be arranged via the Safeguarding Team or the designated member of the Executive team, whichever is most appropriate. External support will normally involve an individual being asked to voluntarily receive tailored support from appropriate external individuals or organisations.

Definition of Radicalisation

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence”. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation;
- Identity crises and/or isolation;
- Political and/or democratic disenfranchisement;
- Discrimination;
- Foreign policy and/or international crises or disputes;
- Political movements;
- Ideologies and/or faiths.

Who are we safeguarding?

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem;
- Guilt;
- Loss;

- Isolation;
- Family breakdown;
- Fear;
- Lack of purpose;
- Anger;
- Peer pressure;
- Indoctrination.

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing vulnerable individuals in.

This raises the question of what will those signs of radicalisation look like. They will often look a lot like adolescent troubling behaviour:

- Emotional** Angry, mood swings, new found arrogance, perceived sense of injustice, sense that other people are “wrong”
- Verbal** Expressing opinions that are at odds with generally shared values, language, phrases and ways of speaking/writing not previously seen/known
- Physical** Appearance (tattoos), change in routine, dress, new obsessions and pre-occupations

What to do if you believe someone to be at risk of radicalisation

The College will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable. This is the ethos promoted by Essex Police Prevent team.

- Notice** Recognition of any changes in behaviour or appearance similar to those outlined above
- Check** Speak with someone you trust (like a tutor/colleague) and see what they recommend but trust your instinct if you are still concerned
- Share** Speak to one of the safeguarding officers to report your concerns.
Remember –trust your instinct

If you are a student and concerned about another student, please **Check** with your tutor in the first instance and **Share** with the Safeguarding Team.

If you are a student and are concerned about a member of staff, or a person who is not a member of the College, e.g. guest speakers, please **Check** with the Safeguarding Team and **Share** with the Student Safeguarding Manager or the Executive Director Human Resources.

If you are a member of staff and are concerned about a student, please **Check** and **Share** with the Safeguarding Team or your line manager.

If you are a member of staff and are concerned about another member of staff please **Check** with

your Line Manager and **Share** with the Executive Director of Human Resources.

If you are a member of staff and are concerned about a person who is not a member of the College, e.g. a guest speaker, please **Check** and **Share** with the AP Student Services.

Responsibility for contacting PREVENT

Any of the following people are responsible for making decisions to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a student:

- ✓ Student Safeguarding Manager
- ✓ Director of SEND and Safeguarding
- ✓ Designated Safeguarding Officer (DSO)

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a member of staff:

- Executive Director Human Resources
- DSO
- DDSO

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a person who is not a member of the College, e.g. a guest speaker:

- Executive Director Human Resources
- DSO

NB. As outlined in Keeping Children Safe in Education (September 2019), anyone has the right to refer to Social Care regarding any concerns for an individual. The College confers this right with regards to extremism and anyone can report a concern to Essex Police by dialling 101. Where this does occur, please inform the Safeguarding Team with regard to a student or member of the public who visits the College and the Executive Director Human Resources with regard to a member of staff.

Press Releases

In the event we are alerted to the fact that a student has been radicalised and actively working with an extremist/terrorist group then we will make sure that we communicate with the press and stakeholders at the earliest convenience. The College takes the position that it is best to work with the stakeholders to inform them of any instances before press releases where possible. If any Governor or staff member are approached by press or other agencies they should refer all items to the Head of Student Services, who is responsible for drafting and managing any communication, and who in turn will alert the Principalship.

Responding to recent Terrorist Attacks in the UK

The College is consulting with the wider Safeguarding community and awaiting direction from the Government on how to implement the 'Run, Hide, Tell' advice that is being advocated if an individual is involved in an incident. We are taking into consideration the risk of spreading alarm with the need to safeguard members of the College community. Any changes that are adopted by the College will be added to this policy as an Addendum.

Appendix 2

Covid-19 Response

Due to the Covid-19 Pandemic, this appendix has been produced to support Harlow College's response

There have been significant changes within our centres in response to the outbreak. Many young people are now at home and staffing is likely to be significantly affected through illness and self-isolation.

Despite the changes, the College's Safeguarding Policy is fundamentally the same: learners always come first, staff should respond robustly to safeguarding concerns and contact the DSL or Safeguarding team in line with our established safeguarding procedure.

This appendix sets out some of the adjustments we are making in line with the changed arrangements in the centres and following advice from government and local agencies, the current College position and local advice

We are following the Governments advice regarding social distancing.

All of our students are being set work remotely by their teaching staff, we provide all of our students with an iPad on enrolment and we are an Apple Distinguished School so we are well-placed to manage this model of delivery and provision. For those learners in our vulnerable lists we are also making regular contact at their normal class times to offer on-going learning support and our safeguarding team are in contact with the learners who fall into the Social Care categories to ensure that we maintain contact and monitor their safety and well-being. We have set Protocols for supporting, monitoring and safeguarding our students and letters that we will be sending in the case of not being able to contact a student or NOK.

Reporting arrangements

The College arrangements continue in line with our Safeguarding Policy.

The Designated Safeguarding Lead is: Sallyann Abdelmoula, email sabdelmoula@harlow-college.ac.uk. Work mobile 07827 838914.

The Deputy DSL is: Pauline Leggett, email plegget@harlow-college.ac.uk. Work mobile 07395964232.

The College's approach ensures the DSL, deputy or a member of the Safeguarding team are always contactable on the above contact details.

Staff will continue to follow the Safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any student via SAFEGUARD. Any problems accessing this then please contact Ken Woolcott. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a student is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority.

We have undertaken a scoping exercise to identify the most vulnerable students.

We have put in place specific arrangements in respect of the following groups:

- Looked After Children.
- Previously Looked After Children.
- Children subject to a child protection plan.
- Children who have, or have previously had, a social worker. There is an expectation that children with a social worker must attend college (or another school/college by arrangement), unless in consultation with the student's social worker and family it is agreed this is not in the best interests of the student.
- Students with an EHCP.
- Students on the edge of social care involvement or pending allocation of a social worker. Where required these young people will be offered a place at college (or another school/college by arrangement).
- Other *students* the school considers vulnerable. More students may be added to this group in response to concerns raised with the DSL. These students can be offered care at college if required.

Each of these students has an individual PEP which is shared with professionals involved in their care.

In addition, the following groups have specific arrangements around contact and support from the college.

- Children of key workers who may attend school

Holiday arrangements

Many schools and colleges are continuing to provide places for children over the Easter break and the College will review its position as we respond to the pandemic.

Attendance

The College is following the attendance guidance issued by government. Where a student is not engaging in learning the College will contact the student and parent/carer to check on the wellbeing of that learner and refer to the safeguarding team if they are unable to make contact.

Staff will be aware of increased risk

The pressures on students and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work for students to undertake at home (including recognising the impact of online learning – see below). Staff will be aware of the mental health of both students and their parents and carers, informing the DSL about any concerns.

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other schools/colleges as an interim measure and similar. When making contact with these families our staff will ask about relationships between learners.

Risk online

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same student -centred safeguarding practices as when students were learning at college.

- The College continues to ensure appropriate filters and monitors are in place.
- Our governing body will review arrangements to ensure they remain appropriate.
- The College has taken on board guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. We have reviewed the Staff code of conduct and information sharing policy accordingly.
- Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the college's Staff code of conduct and importance of using college systems to communicate with students and their families.
- Staff have read the safeguarding considerations for livestreaming prior to delivering any livestreamed sessions.
- Students accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the school, Childline, the UK Safer Internet Centre and CEOP.
- Parents and carers can access information about keeping children safe online with peers from the college website. Parents have been offered the following links:
 - Internet matters - for support for parents and carers to keep their children safe online.
 - London Grid for Learning - for support for parents and carers to keep their children safe online.
 - Net-aware - for support for parents and careers from the NSPCC.
 - Parent info - for support for parents and carers to keep their children safe online.
 - Thinkuknow - for advice from the National Crime Agency to stay safe online.
 - UK Safer Internet Centre - advice for parents and carers.
- Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

Allegations or concerns about staff

With such different arrangements young people could be at greater risk of abuse from staff or volunteers. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

We have confirmed the arrangements to contact the LADO at the local authority remain unchanged.

If necessary, the College will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult in line with KCSE.

New staff or volunteers

New starters must have an induction before starting or on their first morning with the DSL or a deputy. They must read the college Safeguarding policy, the whistleblowing policy and the Staff code of conduct. The DSL or deputy will ensure new recruits know who to contact if worried about a child and ensure the new starters are familiar with the child protection procedure.

If staff or volunteers are transferring in from other registered education or childcare settings for a temporary period to support the care of children, we will seek evidence from their setting that:

- The member of staff has completed relevant safeguarding training in line with other similar staff or volunteers,
- They have read Part I and Annex A of Keeping Children Safe in Education, and
- Where the role involves regulated activity and the appropriate DBS check has been undertaken by that setting we will undertake a written risk assessment to determine whether a new DBS would need to be undertaken. It may be in these exceptional times we can rely on the DBS undertaken by their setting.

Our child protection procedures hold strong:

- Volunteers may not be left unsupervised with students until suitable checks have been undertaken. People supervising volunteers must be themselves in regulated activity, able to provide regular, day to day supervision and reasonable in all circumstances to protect the students.
- The College will undertake a written risk assessment on the specific role of each volunteer to decide whether to obtain an enhanced DBS check (with barred list information) for all staff and volunteers new to working in regulated activity in line with DBS guidance.
- When undertaking ID checks on documents for the DBS it is reasonable to initially check these documents online through a live video link and to accept scanned images of documents for the purpose of applying for the check. The actual documents will then be checked against the scanned images when the employee or volunteer arrives for their first day.
- The College will update the Single Central Record.
- Of all staff and volunteers working in the college, including those from other settings. This will include the risk assessment around the DBS. A record will be kept by HR who are working remotely.

New students/children at the College

Where students/children join our college from other settings we will require confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP. This file must be provided securely before the child begins at our college and a call made from our DSL or a deputy to the placing school/college's DSL to discuss how best to keep the student/child safe. In some unusual circumstance this may not be possible. Information provided must include contact details for any appointed social worker and where relevant for the Virtual School Head. Safeguarding information

about student/children placed in our college will be recorded on our safeguarding system, will be securely copied to the placing school DSL and will be securely returned to the placing college/school on completion of the student/child's placement with us so there is a continuous safeguarding record for the student/ child.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.

TRACKING and REFERENCE INFORMATION

Date Approved: December 2019
Amended and approved: 21 May 2020

Review Date: December each year

Author/Responsibility: Senior Manager with Responsibility for Safeguarding

Equality Impact Assessment: 11th December 2019 (E&D Steering Group meet)

List of related policies, procedures and other documents:

Complaints Procedure
Equality & Diversity Policy
Equality and Diversity Scheme
Student Disciplinary Policy & Procedure
Staff Disciplinary Policy & Procedure
Grievance Procedure
Data Protection 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