Safeguarding (including Child Protection) and Preventing Extremism and Radicalisation Policy

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1. Purpose and Scope

This policy details the responsibilities of EKC Group in relation to safeguarding children and vulnerable adults, in line with current legislation and guidance. It also covers the Group's statutory and moral commitment towards ensuring that students are protected from, and educated about, the dangers of extremism and radicalisation.

EKC Group comprises a number of Colleges and business units. Where necessary, discrete procedures and actions will be in place to reflect local safeguarding concerns, themes and issues.

Throughout the policy and supporting documentation, reference is made to 'children'. This term is used to mean those under the age of 18. The Group recognises that some adults are also vulnerable to abuse and the procedures may therefore be applied (with appropriate adaptions) to allegations of abuse and the protection of adults at risk.

This policy should be read in conjunction with the Group's Safeguarding Procedure for Staff which provides detailed, operational guidance on how to handle safeguarding disclosures and details specific procedures to follow for different safeguarding scenarios and the adult safeguarding procedure.

2. Policy Statement

2.1 EKC Group's ethos is to provide a safe and welcoming environment for staff, students and visitors within all its colleges and business units. It is committed to meeting its duty to safeguard and promote the welfare of children and vulnerable adults and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.

2.2 The Group recognises the need to work with other agencies in performing its duties under the Education Act 2002 and Children Act 2004. These are, in summary: · to have in place and follow procedures in keeping with local multiagency partnership arrangements. In the case of EKC Group, the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) arrangements will be referred to.
- to designate a senior member of staff as having lead responsibility for safeguarding and ensure that they receive appropriate training
- to operate safer recruitment procedures
- to have in place procedures to deal with allegations against staff
- to liaise with schools regarding pre-16 students
- to ensure that all staff receive appropriate safeguarding training and are aware of their responsibilities
- to review policies and procedures annually, ensuring that external partners and experts are involved in the review

- to have in place robust health and safety procedures including protocols for emergency evacuation and invacuation
- to represent EKC Group via the KSCMP.

2.3 EKC Group will ensure that all staff, no matter what role they hold within the Group:

- Will be appropriately trained for their role and will receive awareness of safeguarding and Prevent procedures on a regular basis;
- Will be aware of the processes in place to obtain early help for a student in need and understand their role in obtaining help;
- Will take immediate action when a disclosure is made or when there is a concern that a student's safety and welfare is at risk;
- Will not ignore a disclosure or assume that another colleague is aware of and/or is dealing with it;
- Will not allow data protection concerns to inhibit the appropriate sharing of information.
- Will work in accordance with EKC Group's Safeguarding Procedures.

2.4 The Governing Body has oversight of compliance with safeguarding legislation. The Group Head of Student Experience is the Group's Operational Lead for safeguarding and works with key staff to co-ordinate and manage procedures relating to the protection and safeguarding of children and vulnerable adults including safer recruitment and staff training.

2.5 College Principals and Managing Directors of business units act as the Senior Designated Officers. In this capacity, they operate as the Designated Safeguarding Lead for their respective College/business unit and are the link with Social Services.

2.6 EKC Group is committed to equality and diversity. Decisions and actions taken in relation to a potential safeguarding or child protection incident will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.

2.7 EKC Group has appropriate student admissions procedures in place and reserves the right to refuse admission to any student who may be a risk to themselves and others. This includes challenging the naming of EKC Group in a student's Education, Health and Care Plan if the Group deems that a student carries a significant risk and reasonable adjustments cannot be made to accommodate the student.

3. Monitoring and Review

This policy is reviewed on an annual basis by the Safeguarding Board and is approved by the Governing Body.

EKC Group will consult on the policy with external partners and experts such as the Kent Safeguarding Children Board.

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 EKC Group's activities and staff should therefore read and familiarise themselves with the following policies and procedures:

- Admissions policy
- Data Protection policy and procedures
- Educational Trips and Visits policy
- Equality and Diversity Policy
- Guest Speaker Procedure
- Health and Safety policy
- IT Acceptable Use policy
- Managing Applicants and Students with Criminal Convictions procedure
- Procedure for Managing EHCPs
- Safe EKC Group policy
- Safeguarding procedure for staff
- Staff Code of Conduct
- Student Anti-Bullying and Harassment policy
- Student Disciplinary policy and procedure
- Student Health and Wellbeing policy
- Student Mental Health and Wellbeing policy
- Vetting and DBS Checks policy
- Vulnerable Students who Abscond procedure
- Work Experience policy
- Adult Safeguarding Procedure
- DBS Records Procedure for Contractors and Visiting Staff

5. Local and National Safeguarding Priorities

EKC Group works in accordance with the KSCMP arrangements and participates in the Education Safeguarding Group which provides opportunities to raise awareness of current local and national agendas. The Group operates an internal Safeguarding Committee which is chaired by an independent safeguarding expert who reports directly to the Board of Governors. This measure helps the Group to be apprised of national safeguarding themes and statutory requirements and assists in the planning and implementation of measures to mitigate safeguarding risks.

Where appropriate, Colleges and business units will have their own procedures and action plans in place to address challenges and themes which are experienced at a local level.

6. Designated Staff

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

7. EKC Group's arrangements for specific circumstances/students

7.1 Apprentices

All learners on apprenticeship programmes receive an induction, which includes raising awareness of the Group's commitment towards Safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Safeguarding Officers. 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 well-being is safeguarded by the workplace trainers. Prior to work related activities commencing, EKC Group carry out the following checks:

- 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 EKC Group policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

The safeguarding principles and measures apply to all apprentices whilst on college premises. Where a concern is raised relating to the employer, the EKC Group Designated Safeguarding Lead will liaise with the Managing Director of EKC Group Training to address and decide on an appropriate course of action.

7.2 Child Missing Education

EKC Group will ensure that all students, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. The Group recognises its duty to establish, as far as it is possible to do so, the reasons why students are missing from their programme. The Group recognises that when a 16 or 17-year-old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation, involvement with gangs or radicalisation. Every "missing" episode will attract proper attention from the staff involved.

7.3 Children in EKC Group's Nurseries

The Nurseries have their own stringent safeguarding policies and procedures.

7.4 International & ESOL Students

EKC Group will ensure that for students where English is their second language the induction on safeguarding is delivered so they gain a full understanding. There will

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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 college is also 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

All international host families are also subject to checks through the Disclosure and Barring Service (DBS).

7.5 Students who are looked after, in care or leaving care

EKC Group operates in an area where there is a relatively high number of looked after children. The Group will afford children and young people who are 'looked after' or living away from home (including those who are privately fostered) the same essential safeguards against abuse, but practice will be framed on an understanding that there may be additional risks and vulnerabilities for children and young people who are looked after.

7.6 Students aged 14-16

Primary responsibility for any school pupil attending programmes at an EKC Group College or business unit remains with the home school; any incidents or issues with the safeguarding of a young person should be referred to the College's named person. They will then liaise with the Senior Safeguarding Officer and the Local Authority as required.

Safeguarding issues relating to a student, under 16, attending EKC Group as their main educational provider, will be addressed by the designated staff following the same guidelines and procedures as other students. Particular care should be taken as these learners are more vulnerable than other students because of their younger age.

All Junior College and Electively Home Educated (EHE) students wear a specific lanyard that highlights their safeguarding risk. There will be a dedicated space determined by the local College where these students will attend for their break and lunch periods. The local College will inform parents of the dedicated spaces which will be agreed at enrolment between the parent and the College. Each College will have a designated person on call who will be informed if:

- a 14-16-year-old does not return to lesson after break or lunch

- Is seen outside of designated areas at any time

- Is seen leaving the College.

7.7 Students with a Learning Difficulty or Disability

Students with learning difficulties and/or disabilities can face additional safeguarding challenges. The Group will ensure that parents and students who have a learning difficulty or disability are made fully aware of the safeguarding procedures during their Additional Learning Support interview. This will ensure that the information is delivered and adapted so it is accessible and meets their individual needs.

Information on how to contact a Safeguarding Officer will also be adapted i.e. numbers, names and locations in Braille for students with visual loss; for deaf students and students with a speech disorder the safeguarding e-mail address is available. Students with learning difficulties will have access to additional pastoral support where necessary.

Staff who work with students with learning difficulties and disabilities receive discrete training to enable them to support students appropriately. This includes aspects such as training in online safety so that they are confident in keeping students safe.

7.8 Students on subcontracted programmes

All learners on courses delivered by a subcontracted EKC Group partner receive details of the support services offered and contact details for the Safeguarding Officers. 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. Arrangements are in place to ensure that, prior to a course commencing:

- A Training Facility Health and Safety check list is completed.
- A risk assessment of the premises is carried out.
- All insurance documents are checked, and copies taken.
- Partners are made aware of relevant EKC Group policies.
- An annual check of Safeguarding Policy to include Prevent Strategy is undertaken.
- All staff in contact with learners 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.

7.9 Students on Work Placements

EKC Group has a work experience policy in place which assures the health, safety, welfare and safeguarding of students who attend work placements with employers. All work placement providers will be given specific safeguarding information by the Industry Liaison Officer/Work Placement Officer/Trainer. Employers sign a work placement understanding saying they have received the information and are aware of their duty under Safeguarding.

7.10 Child absent from education

It is important to remember that being absent from college, 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. If students are persistently absent or their absence is concerning, please refer to a DSL/ Mentor immediately

8. Preventing Extremism and Radicalisation

As part of wider safeguarding responsibilities EKC Group staff will be alert to:

- Disclosures by learners 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 learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Partner Colleges, local authority services, and police reports of issues affecting learners in other Colleges or settings
- Learners voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths or cultures or advocating violence towards others
- Use of extremist or ''hate'' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture
- Attempts to impose extremist views or practices on others
- Making remarks about being at extremist events rallies outside college
- The weekly monitoring sheet for the Reflection Rooms

8.1 Promoting British Values

In line with the provisions of s.78 of the Education Act 2002 the Group 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' and 'Our Expectations'.

- The underlying messages delivered to students at student representative meetings and the Student Union Committee meetings.

- The displays in classrooms, corridors, student centres and in the Learning Zones.

- In the manner and consistency with which students' views are challenged should they conflict with such values.

Any students displaying such behaviours will be reported to a Safeguarding Officer.

8.2 Guest Speakers and Visitors
EKC Group 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 Group:

- Values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.
- Values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal procedures.
- Recognises and supports the moral and legal frameworks of the society and community within which it works.
- 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.
- 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 relevant College Principal of the campus prior to distribution. Other than the promotion of EKC Group business, staff and students must also request the permission of the Principal before distributing leaflets.

Further information can be found in EKC Group's Guest Speaker Policy.

9. Raising awareness about Safeguarding
EKC Group is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that there is a Safeguarding Team and how they can access support and students agree to a code of conduct and standards of behaviour when they enrol.

Colleges and business units within EKC Group will inform students about who they can talk to in and out of college and what steps can be taken to protect them from harm. Safeguarding information is delivered to students at the start of their course and reinforced throughout their programme of study via tutorials, talks and activities. Where there is intelligence about particular issues and themes such as sexual

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harassment/violence etc. students will receive targeted information, guidance and support. All education and awareness will be based on the principles of respect for self and others, dignity and the importance of consent.

10. E-Safety / Online Safety

E-Safety / online safety covers issues relating to young people as well as adults and their safe use of the Internet, mobile phones and other electronic communications technologies, both in and out of College. It includes awareness raising for all members of EKC Group's 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 / online safety practice in the learning environment in order to educate and protect the young people and vulnerable adults in their care.

The use of technology can play a significant part in many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates the abuse. The three main areas of risk are:

- **content**: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;

- **contact**: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;

- **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

It is important that staff take account of the Staff Safeguarding Procedure, recognising the need to maintain professional standards and where possible to support students in small groups rather than on a 1:1 basis.

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

E–Safety / online safety awareness will also be part of student induction. Safe and responsible use of the Internet and 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. Particular attention to e-Safety education will be given where students are considered to be vulnerable. The relevant Senior Designated Safeguarding Officer will be informed of any e-Safety incidents, and any incidents involving Child Protection or vulnerable adult concerns will then be escalated appropriately. Any material that the Group

believes is illegal will be reported to appropriate agencies such as Internet Watch Foundation (IWF), Kent Police or CEOP (Child Exploitation & Online Protection Centre)

Colleges and business units will record e-Safety and online safety incidents and manage concerns in accordance with the disciplinary policies where appropriate.

10.1 Filtering and monitoring

Filtering and monitoring standards outline that we should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.

- review filtering and monitoring provision at least annually.

- block harmful and inappropriate content without unreasonably impacting teaching and learning.

- have effective monitoring strategies in place that meet their safeguarding needs.

- The joint responsibility of monitoring and filtering sits with the Deputy CEO and the Director of Digital

11. Parental involvement
EKC Group is committed to ensuring that all parents/carers of under 18's have an understanding that the Colleges have a duty to safeguard and promote the welfare of children who are their students. Parents/carers will receive information via their young person during induction, making it clear that staff may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. Parents/carers will be asked to sign to confirm they have received this information.

Safeguarding Officers will contact Parents/carers 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 Officer will keep the parent/carer informed of actions progress.

12. Staff Training
Designated staff receive multi-agency safeguarding training every 2 years, and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up to date with developing local and national priorities. Where there are emerging

national or local themes and issues for example, sexual harassment, sexual violence, hazing or county lines, staff will receive discrete training and information to help them support students appropriately.

All other staff and governors receive mandatory training as part of their induction, to ensure they are aware of their safeguarding responsibilities and of the Group's policies and procedures. The training includes recognising signs of abuse and recording and reporting suspected abuse. They receive both online and face-to-face updates on safeguarding and child protection at least annually.

All staff are required to familiarise themselves with annual updates to the statutory guidance Keeping Children Safe in Education. Staff who recruit receive safer recruitment training.

All staff are made aware of duties under the Prevent agenda via staff induction and online update training.

All training is recorded on staff members training records.

13. Recruitment of Staff

The colleges should inform shortlisted candidates that online searches may be done as part of pre-recruitment checks.

14. Organisations or individuals using the colleges

In the case of allegations relating to incidents occurring when an individual or organisation uses the college's premises. As with all safeguarding allegations, the college should follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).