

Safeguarding

Child Protection and Vulnerable Adults Policy and Procedure

Mae'r ddogfen hon ar gael yn y Gymraeg / This document is available in Welsh

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PREAMBLE TO THE POLICY

Equal Opportunities

The College shall comply with all statutory duties in respect of equal opportunities in the areas of sex, race, age, disability, sexual orientation, transgender, religion, belief, pregnancy, maternity and paternity, marriage and civil partnership and the rehabilitation of offenders. The college shall also comply with the Human Rights Act 1998 and any subsequent enactments or modifications.

Sustainability

The college will comply with all statutory duties in respect of sustainable development by seeking to improve the long-term economic, social and environmental wellbeing of people and communities. This needs to be done in ways which promote social justice, equality of opportunity and which enhance the natural and cultural environment while respecting its limits.

Welsh Language

The Welsh Language Measure of 2011 ensures the equal status of the Welsh language alongside the English language. This law has created the role of a [Welsh Language Commissioner](#) and has introduced a number of Welsh Language Standards with which the College is under a statutory duty to comply. This includes conducting Welsh Language Impact Assessments for all new and revised policies.

1. INTRODUCTION

The aim of this policy is to provide clear direction to staff and others about how to deal with child protection and vulnerable adult issues. It also makes explicit the College's commitment to the development of good practice and sound procedures, ensuring that child protection and vulnerable adults concerns and referrals are handled sensitively, professionally and in ways which support the needs of learners.

In this policy the term "Child" applies to all persons who are under 18 years of age, as defined by the Children Act 1989, and are either learners enrolled at the College or other attending specific activities arranged and managed by the College irrespective of site.

In this policy the term "Vulnerable Adult" applies to a person over 18 years of age who:

"is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation" Law Commission (Who decides?: making decisions on behalf of mentally incapacitated adults 1997)

People with learning disabilities or mental health problems, older people and disabled people may fall within this definition, particularly when their situation is complicated by additional factors, such as physical frailty or chronic illness, sensory impairment, challenging behaviour, social or emotional problems, poverty or homelessness.

Everyone working in an education setting who comes into contact with learners and their families has a role in safeguarding children and vulnerable adults. Safeguarding is protecting children and vulnerable adults from abuse, neglect or other kinds of harm, and educating those around them to recognise the signs and dangers. Safeguarding and promoting the well-being of all children and vulnerable adults and attending college is defined for the purposes of this policy as:

- protecting children and vulnerable adults from risk of abuse, neglect or other kinds of harm;
- preventing impairment of children's and vulnerable adults health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children and vulnerable adults to achieve the best outcomes.

These procedures are intended to guide safeguarding practice for all those employed in the statutory, third (voluntary) and private sector in health, social care, education, police, justice and other services. They are applicable for all practitioners and managers working in Wales - whether employed by a devolved or non-devolved agency.

The College's PREVENT responsibilities under the Counter-Terrorism and Security Act 2015 are an integral part of the Safeguarding Policy. The College has published a PREVENT Protocol (see Appendix 1) which details the College's PREVENT obligations,

the statement of policy, roles and responsibilities and the internal and external referral processes.

DESIGNATED SENIOR PERSON FOR SAFEGUARDING AND OTHER SAFEGUARDING ROLES

The Designated Senior Person (DSP) with responsibility for Child Protection and Vulnerable Adults is the Vice Principal/COO. Please see Annex A for other designated staff involved in safeguarding.

All staff have a responsibility for safeguarding learners. All staff must ensure that any disclosure made to them is passed to an appropriate designated member of staff in a timely fashion.

The DSP is responsible for developing and monitoring this policy and procedure. They will be the lead contact for corporate safeguarding matters. They will ensure the Principal and governing body are made aware of serious cases.

The Senior Designated Safeguarding Officer (SDSO) (AP Learner Experience) will support the DSP in development and monitoring of the policy and offer day to day advice on policy and procedures to college staff and external agencies, and act as their deputy in their absence.

The Directors of Learner and Campus Services are Designated Safeguarding Officers (DSOs) along with the Director of Human Resources. They will receive safeguarding referrals and take responsibility to ensure the procedure laid down in this document is followed on each campus. They will be closely supported by both the DSP and the SDSO. The College also has appointed a DSO (Director of Finance) for those people who wish to make a disclosure in Welsh.

The College's Designated Safeguarding Governor will meet on a termly basis with the DSP in order to be assured that effective policies, processes and procedures are in place for safeguarding learners.

The names and contact details of the designated members of staff will be displayed at strategic points on every campus. Safeguarding information will be circulated to learners on a termly basis by the SDSO.

In the absence of designated members of staff, Child Protection and Vulnerable Adult concerns should be reported to a member of the Senior Leadership Team. If, for whatever reason, none of the staff mentioned above are available, the individual staff member has a personal responsibility to ensure that Child Protection and Vulnerable Adult concerns are reported directly to the appropriate authorities such as the Police or Children's Services.

2. **WHAT DO THE TERMS ABUSE, NEGLECT AND PREVENT / RADICALISATION MEAN?**

The College uses the following definitions to guide its child protection and vulnerable adults work:

Neglect

The persistent or severe neglect of a child (for example by exposure to any kind of danger, including cold and starvation) which results in serious impairment of the child's health and development including non-organic failure to thrive. This may be by exposure to danger or by repeated failure to attend to the physical and developmental needs of the child. This may include failure to provide food, warmth, clothing or consistent care taking. Non-organic failure to thrive would also be included under this category.

Physical Abuse (Injury)

Physical abuse is defined as any physical injury to a child where there is a definite knowledge, or a suspicion that the injury was inflicted or knowingly not prevented. This includes deliberate poisoning.

The use of any implement to strike a child constitutes physical abuse within the terms of these guidelines and must be investigated. Marks, bruises or other significant injuries are likely to be the result of considerable force and where it is known that a child has been injured in this way for whatever reason, it must be treated and investigated as physical abuse. It is unacceptable to strike a child with a closed fist or to bite, burn or cause a child to be scalded and such behaviour must also be investigated.

Sexual Abuse

The involvement of developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent, or which are illegal, or which violate the social taboos of family roles. Sexual abuse may be perpetrated by a third party within the family network e.g. a relative or friend who visits the child's home or whom the child frequently visits.

Emotional and Psychological Abuse

Severe adverse effects on the behaviour and emotional development of a child caused by:

- rejection
- racial abuse
- isolation – deprivation of access to social contact and resources
- terrorising – chronic threatening of abandonment or of grave bodily harm
- ignoring – chronic deprivation of parental attention
- corruption – subjecting children to deviant child care practices
- excessive age inappropriate demands that a child is unable to meet

All abuse involves some emotional ill-treatment, but this category should be used where it is the main or sole form of abuse.

Financial abuse

Financial abuse includes (a) having money or other property stolen, (b) being defrauded, (c) being put under pressure in relation to money or other property, and (d) having money or other property misused. Other forms of financial abuse include fraud, internet scamming and coercion in relation to financial affairs or arrangements. When a learner discloses abuse it usually means that they are asking for help. The diagnosis of abuse is outside the remit of College staff, but learners may disclose information that can be interpreted as abuse.

PREVENT / Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Many now regard radicalisation as abuse and the College has a PREVENT Protocol where victims would be referred for support. If this is the alleged abuse the matter should be referred to the College PREVENT lead who is the Vice Principal (Academic).

3. COLLEGE COMMITMENT AND RESPONSIBILITIES

All those working in the College have a responsibility to contribute to the safeguarding of children and vulnerable adults. The College will:

- Establish and maintain an ethos where all learners feel secure and are encouraged to talk, and are listened to;
- Create a safe learning community in respect of all aspects of safeguarding;
- Ensure that, regardless of age, all learners who have experienced any form of abuse will receive help, support and information on agencies that will be able to offer appropriate support to meet their needs;
- Support a learner who has special educational needs or is disabled to ensure to the most effective means of communicating with that learner and to determine their level of understanding;
- Operate appropriate recruitment, Disclosure and Barring Service (DBS) checks, management and training procedures of staff and volunteers to ensure that the welfare of learners is always of paramount concern;
- Ensure the relevant staff are registered with the Education Workforce Council (Wales).
- Ensure that appropriate DBS arrangements are carried out for host families who accommodate college learners aged under 18;
- Ensure all staff undertake training during induction so that they are aware of the systems and procedures that support safeguarding within the college. HR will keep records of the training.
- Ensure all staff and governors undertake regular refresher training.
- Ensure staff are alert to the signs of abuse and neglect and know the agreed procedure for reporting concerns or suspicions to the DSP or another designated member of staff;
- Raise awareness of child protection and vulnerable adult issues during induction and the tutorial programme. Course tutors and Welfare and Wellbeing Officers have a joint responsibility to ensure that learners are aware of their rights and the safeguarding processes in relation to child protection and vulnerable adult issues;
- Ensure that every effort will be made to establish effective working relationships both with parents/guardians and with colleagues from other relevant agencies;
- Work together with the appropriate County Councils' Children and Adult Services and other agencies and comply with their procedures;

4. ACTION TO BE TAKEN WHERE THERE IS A CHILD PROTECTION OR VULNERABLE ADULT ISSUE

All complaints, allegations or suspicions must be taken seriously, and the correct procedure followed.

If a learner approaches you and discloses details/allegations of abuse or neglect, whether on behalf of themselves or another learner, staff:

- i. must listen to the learner but **MUST NOT** make any promise to maintain confidentiality. It should be explained that any concerns may have to be relayed to others. (This could include the DSP, the SDSO, the DSOs, designated members of staff, social services and the police);
- ii. must keep questions to a necessary minimum and leading questions must be avoided. The use of leading questions may impede any subsequent investigation and/or court proceedings;
- iii. should seek, if possible, the learner's agreement to refer the case to the DSP, SDSO, a DSO or the appropriate agencies if the DSP, SDSO and the DSOs are not available;
- iv. must pass on any notes to the DSP, the SDSO or the DSOs immediately;
- v. must report any suspicion, allegation or incident of abuse to the DSP, the SDSO or one of the DSOs on the same day/evening it is disclosed. They must forward the allegation to the DSP, the SDSO or one of the DSOs in writing within 24 hours;

Either the DSP, the SDSO or one of the DSOs will consider the case. If there are immediate concerns about a learner's safety or a criminal offence against a learner is suspected, the DSP, the SDSO or the DSO:

- vi. Must contact the emergency services without delay to protect the learner from the risk of serious harm. If it is decided to refer to the case to social services and/or the police this will be done within 24 hours. Outside of office hours, reports must be made to the social services emergency duty service or to the police. Where a report is made in person or by telephone, it must be confirmed in writing within two working days. It is important to note that any staff member can also report concerns to local authority social services or to the police directly; however, liaison with the DSP or a DSO is advisable in all cases where possible;
- vii. must ensure that the learner is provided with appropriate information on the options available to them or the responsible agencies informed. **It may be necessary for some young people with learning difficulties and/or disabilities to have particular attention paid to their individual needs when dealing with child protection and vulnerable adult issues;**
- viii. must ensure that the learner has the right to see all information retained on them (although this will not apply in some criminal cases).

If it is judged that no further action is necessary, then the DSP, the SDSO and the DSO

- ix. must formally record the reasons for this decision. The DSP, the SDSO and the DSOs should share the following information with the staff member reporting the safeguarding issue:
- the proposed initial action, including signposting or that no further action will be taken; and
 - who will be taking action.

Throughout the process, the DSP, the SDSO and the DSOs must keep detailed, accurate, and secure written records. This documentation is confidential and must be kept secure. They should include a chronology of concerns, reports, meetings, phone calls and emails. The DSP, the SDSO and the DSOs will attend Safeguarding Children Board (SCB) meetings and multi-agency practice reviews when required.

The SDSO and the DSOs will report to DSP on a monthly basis a summary of all safeguarding matters. The DSP will share this report with the principal, so that they are of on-going cases and agrees with the action undertaken. The DSP will prepare a termly report summarising all safeguarding matters for the designated safeguarding governor. The SDSO will produce an annual report for the strategic leadership team and governing body that summarises safeguarding work for the year.

5. SAFE COLLEGE, SAFE STAFF GUIDELINES

Staff are encouraged to display a caring and supportive attitude to learners. This relationship must be a professional one and the boundaries of the staff/learner interface should be observed at all times.

Staff should not engage in inappropriate behaviour with learners i.e. behaviour which is an abuse of power, position or relationship. Staff are advised not to engage in social media, social or other activities with learners. Staff are reminded that sexual activity with a learner aged under 18 is inappropriate and could lead to disciplinary action.

Where one-to-one work between staff and a learner is unavoidable this should take place in as visible a place as is possible. Where teaching or advice is given about sexual matters it is strongly recommended that for single sex groups this input should be given by a tutor of the same gender. When advice is requested by individual learners, they should be referred to the Welfare and Wellbeing Officers who will be able to refer to the appropriate agency.

6. ADDITIONAL SERVICES AND ACTIVITIES

Where services are provided directly under the supervision of the College then the College's Safeguarding Policy will apply. Where activities and services are provided separately the College will ensure that the body concerned has appropriate safeguarding and child protection policies and procedures in place. Contractors who work on a College site will adhere to the College's Safeguarding Child Protection and Vulnerable Adults Policy. Staff who teach off site for another provider (e.g. in a school) will need to follow the Safeguarding procedures of that provider.

7. ALLEGATIONS AGAINST A COLLEGE EMPLOYEE

An employee includes those directly employed by the College, volunteers working for the College and the self-employed working under contract for the College. Agency workers are also covered by this policy, but DBS checks are the responsibility of the agency.

Learners may make allegations regarding perceived abuse by college staff. These will be treated seriously and all procedures as laid down in this policy will be followed.

Where an allegation or suspicion of abuse is made against a College employee then this must be reported immediately to the DSP or one of the nominated members of staff as soon as possible. The DSP will be responsible for informing the Director of Human Resources of any allegation as soon as it is made known to them. All employees will be supported at all times throughout the process by Human Resources.

If the SDSO, one of the SDOs or a member of the strategy leadership team is the subject of a safeguarding allegation or a safeguarding matter which may compromise their ability to discharge their safeguarding duties, it should be reported to the Principal or the DSP immediately. The Principal and DSP are responsible for overseeing any safeguarding allegation or matter against the SDSO, the DSO's and members of the strategic leadership team which may compromise their ability to discharge their safeguarding duties.

If the DSP or the Principal is the subject of a safeguarding allegation or a safeguarding matter which may compromise their ability to discharge their safeguarding duties this should be referred immediately to the Designated Safeguarding Governor.

8. RELATIONSHIP TO OTHER POLICIES AND EXTERNAL DOCUMENTS

This policy should be read in conjunction with the Welsh Government Keeping Learners Safe which was published in October 2020. In addition, the Whistleblowing policy, Behaviour and Discipline Policies relating to both learners and staff and the Bullying and Harassment documents.

9. REVIEW AND MONITORING OF THE POLICY

The Policy will be reviewed every year by the Vice Principal / Chief Operating Officer.

COLEG Y CYMOEDD POLICY DOCUMENT

ANNEX A

Designated Senior Person for Safeguarding (DSP)			Contact Details	
Jonathan Morgan	Vice Principal / Chief Operating Officer		T: 01443 810137 M: 07972299620	E: jonathan.morgan@cymoedd.ac.uk
Senior Designated Prevent Officer (SDPO)				
Andy Johns	Vice Principal Academic		T: 01443 663179 M: 07786638696	E: andy.johns@cymoedd.ac.uk
Senior Designated Safeguarding Officer (SDSO)				
Karen Workman	Assistant Principal Learner Experience		T: 01443 663302 M: 07563 025060	E: karen.workman@cymoedd.ac.uk
Designated Safeguarding Officers (DSO)				
Mark Thomas	Director of learner & campus services	Aberdare	T: 01685 887517 M: 07788101453	E: mark.thomas@cymoedd.ac.uk
Karen James	Director of learner & campus services	Nantgarw	T: 01443 663034 M: 07584130926	E: karen.james@cymoedd.ac.uk
Carolyn Donegan	Director of learner & campus services	Rhondda	T: 01443 663250 M: 07815315834	E: carolyn.donegan@cymoedd.ac.uk
Alison Roberts	Director of learner & campus services	Ystrad Mynach	T: 01443 810086 M: 07976241405	E: alison.roberts@cymoedd.ac.uk
Julie Rees	Director of HR	Rhondda	T: 01443 663201 M: 07855524994	E: julie.rees@cymoedd.ac.uk
David Francis (Welsh language only)	Director of Finance	Rhondda	T: 01443 653633 M:	E: david.francis@cymoedd.ac.uk
Designated Governor				
Margaret Lippard	Governor	Nantgarw	T: 01443 812117	E: mlippard@hotmail.co.uk

COLEG Y CYMOEDD POLICY DOCUMENT

Strategic Leadership Team		Contact Details	
Karen Phillips	Principal	T: 01443 663002 M: 07817560997	E: karen.phillips@cymoedd.ac.uk
Jonathan Morgan	Vice Principal / Chief Operating Officer	T: 01443 810137 M: 07972299620	E: jonathan.morgan@cymoedd.ac.uk
Andy Johns	Vice Principal (Academic)	T: 01443 663179 M: 07786638696	E: andy.johns@cymoedd.ac.uk
Gavin Davies	Assistant Principal	T: 01443 653667 M: 07584 089458	E: gavin.davies@cymoedd.ac.uk
Matthew Tucker	Assistant Principal	T: 01443 810084 M: 07817739908	E: matthew.tucker@cymoedd.ac.uk
Karen Workman	Assistant Principal	T: 01443 663301 M: 07563 025060	E: karen.workman@cymoedd.ac.uk
Neil Smothers	Assistant Principal	T: 01443 810123 M: 07411946873	E: neil.smothers@cymoedd.ac.uk



**COLEG Y CYMOEDD
PREVENT PROTOCOL**

Introduction

The Government has published '*Prevent Duty Guidance: Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism*'. Specified authorities, which include Further Education Colleges, Universities, Schools and Health Boards are required to be legally compliant.

1. WHAT IS PREVENT?

1.1 PREVENT is one of the four elements of CONTEST, the government's counter-terrorism strategy. The other strands of CONTEST are PROTECT, PREPARE and PURSUE. PREVENT aims to stop people becoming terrorists or supporting terrorism. The paper, '*2010 to 2015 Government Policy: counter-terrorism*', published 7th May 2015, says:

The PREVENT strategy (2011):

- *responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views*
- *provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support*
- *works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.*

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

This is often commonly referred to as the three I's: Ideology, Individuals and Institutions.

2. WHAT ARE THE RISKS?

- 2.1 The Home Office Duty Guidance makes specific reference to the following risks.
- some learners may arrive at the College already committed to terrorism
 - some may become radicalised while at College
 - learners may use the Internet to access information that can be used for terrorist activity
 - visiting speakers at events on campus may encourage extreme views or incite violence.
 - learners with extreme views may influence their fellow-learners through word of mouth or social media.
- 2.2 There is also the risk that in implementing the PREVENT agenda an atmosphere of suspicion may be created which could be counterproductive.
- 2.3 The Duty Guidance makes reference to the need for appropriate staff training, chaplaincy and welfare support, IT, external speaker and freedom of speech policies to counter the risk of learners being vulnerable to radicalisation.

3. WHAT ARE THE COLLEGES' OBLIGATIONS?

3.1 The *Prevent Duty Guidance* states:

“In fulfilling the duty in section 26 of the Act, we expect all specified authorities to participate fully in work to prevent people from being drawn into terrorism.” (para 12)

“All specified authorities must comply with this duty and will be expected to maintain appropriate records to show compliance with their responsibilities and provide reports when requested.” (para 23)

The document *PREVENT Duty Guidance for Further Education institutions in England and Wales* (2015) includes the statement:

“Each institution should carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism. These policies and procedures will help an institution satisfy itself and government that it is able to identify and support these individuals” (para14)

This means that the Coleg y Cymoedd's compliance is based on a specific institution wide risk assessment.

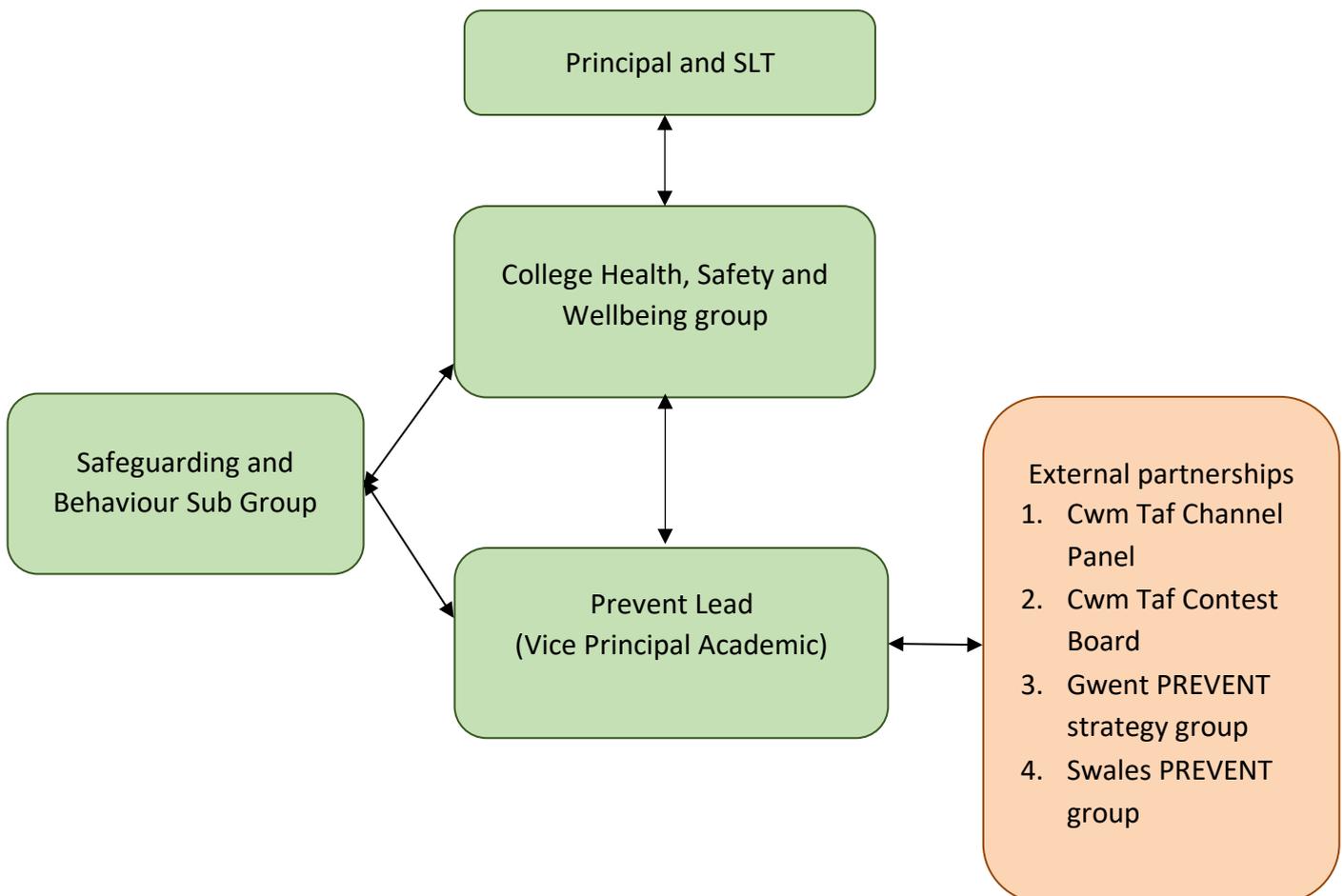
4. STATEMENT OF POLICY

- 4.1 Coleg y Cymoedd is an inclusive institution which aims to provide an environment where individuals are enabled to meet their full potential and to express themselves freely within the law.
- 4.2 The College is a diverse community and values the richness that diversity and difference bring to the academic life of the institution and our ability to engage globally. Diversity adds value to the learner experience and to the College. Central to this concept is the ability of all its members freely to challenge prevailing orthodoxies, query the positions and views of others and put forward radical ideas that may sometimes be controversial. An environment of free and open discussion is essential to the development of lively, enquiring minds and the ability to question argue and listen that is a central element in College education.
- 4.3 At the same time, the College is committed to creating a context in which staff and learners can work and study unhindered by hostility, offensive conduct or intimidation. Staff and learners are expected to respect this in the manner and tone with which they express their views. This principle extends to conduct online and on social media.
- 4.4 Colleges do not exist in a vacuum. Wider conflicts and disputes, often involving ethnicity or religious faith, may sometimes find expression on campus amongst the college community. The challenge for colleges is to identify when the pursuit of freedom of ideas and expression crosses a threshold and becomes harmful.
- 4.5 Staff are required to do all they can to mitigate grievance at the earliest possible stage and to avoid taking any action or making any statement that may exacerbate a grievance. Appropriate referral should be made through the PREVENT processes at an early stage.
- 4.6 The College recognises that people with radical views have things to say. In the context of the College community it is important that such views are expressed in a way which makes clear that they are not conducive to, or supportive of, causing harm or violence or promoting or inciting hate.

- 4.7 The PREVENT Duty Guidance is a new and developing area of responsibility placed on the College by Government. The College will be guided in its compliance procedures by government, wider FE partnerships and other statutory bodies.
- 4.8 General legal principles, and in specific areas legislation, provide that the proportionate and reasonable limitation of expression is permissible in order to maintain public order and safety or to ensure that there is no breach of the law. Whilst the College recognises the right of staff and learners to express opinions contrary to the corporate view, the right to freedom of speech is not absolute. The College will, on occasion, have to weigh conflicting demands for free public expression of ideas against concerns on its part regarding public order and safety or the potential for breaches of the law to occur.
- 4.9 Furthermore, the College has a duty under the Counter-Terrorism and Security Act 2015 to prevent staff and learners from being drawn into terrorism and ensure they are being given appropriate advice and support.
- 4.10 The College acknowledges that it has both a legal and a moral responsibility to act in a proactive manner in order to minimise the possibility that harmful extremism or intolerance will arise on campus whilst at the same time ensuring the general continuance of freedom of speech.

5. STRUCTURE

The following diagram is an outline of the structure for implementing the PREVENT compliance agenda.



The Vice Principal / COO as the college's Senior Designated Safeguarding Person (SDSP) is responsible for developing and monitoring this policy and procedure. They will be the lead contact for corporate PREVENT matters. They will ensure the Principal and governing body are made aware of serious cases.

The Senior Designated Prevent Officer (SDPO) (Vice Principal Academic) will act as the PREVENT lead. They will support the DSP in development and monitoring of the policy and offer day to day advice on policy and procedures to college staff and external agencies, and act as their deputy in their absence. They will support the DSP in the development and monitoring of the policy and offer day to day advice on policy and procedures to college staff and external agencies, and act as their deputy in their absence.

The Directors of Learner and Campus Services are Designated Safeguarding Officers (DSOs) along with the Director of Human Resources. They will support the PREVENT lead and take responsibility to ensure the procedure laid down in this document is followed on each campus. They will be closely supported by both the SDSP and the SDPO. The College has also appointed a DSO for those people who wish to make a disclosure in Welsh.

In the absence of designated members of staff, PREVENT concerns should be reported to a member of the Senior Leadership Team.

6.ROLES AND RESPONSIBILITIES

6.1 The Designated Safeguarding Officers will:

- be familiar with the College's Freedom of Speech Code of Practice, PREVENT Protocol and the College External Speaker Policy.
- be trained in PREVENT issues and the College's PREVENT procedures and protocols
- be available to give initial and informal advice to staff
- receive queries or expressions of concern from staff and learners
- receive applications for inviting external speakers for extra-curricular events at their Campus, and decide on applications they deem to be non-controversial
- refer as appropriate any issues of concern or potentially controversial speaker applications to the PREVENT Lead (Vice Principal Academic)
- be a link between the Campus and the PREVENT Lead (Vice Principal Academic)
- keep a record of all relevant conversations, applications and their outcomes.

6.2 The **College PREVENT Lead (Vice Principal Academic)** will:

- be the Single Point of Contact directly accessible to all staff
- be available to give initial and informal advice to staff
- receive expressions of concern from Safeguarding designated persons. These may be resolved by informal conversation, but if there seems to be a real matter for concern, the PREVENT Lead will gather information in order to build as full a picture as possible of the situation, consult with key staff and decide what action if any needs to be taken
- be forwarded any external speaker applications that may be considered controversial
- consult when necessary with the Regional PREVENT Coordinator and others
- as appropriate, consult the Principal
- be the point of reference for all PREVENT issues internally and externally
- keep a record of all relevant conversations, applications and outcomes.

7. INTERNAL REFERRAL PROCESS

- 7.1 Anyone who suspects a learner for a member of staff is becoming involved in non-violent/violent extremism and/or terrorism can contact a Designated Safeguarding Officer for an informal conversation. If a concern persists, they should formally refer the matter to the College's PREVENT Lead.
- 7.2 If a concern is referred to a Designated Safeguarding Officer the following process will be followed:
- The Designated Safeguarding Officer will undertake a brief risk assessment and may consult relevant colleagues discreetly.
 - If the Designated Safeguarding Officer believes that a concern has been reasonably substantiated, they will refer the matter to the College PREVENT Lead. The Designated Safeguarding Officer will keep a record of any concerns expressed and any action or decision not to take action.
 - The College PREVENT Lead may consult with Senior Designated Safeguarding Person in order to build a clear picture and context for the concern and will decide whether a referral to the PREVENT Channel Panel is appropriate or whether alternative supportive action is necessary.

8. EXTERNAL REFERRAL PROCESS

- 8.1 If a concern cannot be satisfactorily resolved internally, a PREVENT referral will be made as the initial step in ascertaining suitability for admittance onto the CHANNEL Process.

A PREVENT referral is made initially to the Channel Coordinator. This referral is assessed for suitability to be forwarded to the Channel process.

The Channel Process operates across England and Wales as a key part of the Government's Prevent strategy. It is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.

- 8.1.1 The PREVENT Lead will be the sole point of referral for the institution. In their absence the Vice Principal Chief Operating Officer will authorise an alternative.
- 8.1.2 Where this would not constitute a danger to individuals or groups, the person being referred will be informed of the referral at the time transfer to the CHANNEL process is made.
- 8.1.3 The Directors of Learner and Campus Services will offer support to the individual through the referral process and the CHANNEL programme and liaise with other support services to coordinate a holistic support network for the learner.

9. REFERRAL FOR CONSIDERATION UNDER OTHER COLLEGE POLICIES

- 9.1 Following consideration of all the facts, it may be considered appropriate for a learner to be referred to other College processes, such as the Behaviour or Fitness to Study process. In this case, the Prevent Lead will liaise as appropriate with the relevant staff.
- 9.2 Following consideration of all the facts, it may be considered appropriate for a staff member to be referred to the College's disciplinary procedures
- 9.3 The College has a Whistleblowing policy in place should it be felt that staff are not applying college policies correctly.