



Safeguarding Policy and Procedures

Safeguarding Policy Statement

The College acknowledges that it has a legal responsibility to comply and provide evidence of its compliance with the Prevent Duty, including serious issues related to safeguarding the College community from extremism and radicalisation to the OfS.

Safeguarding remains a key action item in the implementation of Prevent Duty policy. Safeguarding against radicalisation and extremism thus remains essential and, therefore, requires a clear policy and procedures. The College already has identified clear measures to tackle the issues of radicalisation and extremism. This document outlines the College policy and procedures on safeguarding. The policy document has been updated to include provision for major unexpected events on the request of the Board of Management, in line with the revised statutory guidance on Prevent Duty¹ of 1 April 2021.

The College policy on safeguarding intends to comply with the requirements of the Prevent duty framework of the Office for Students (OfS). The College is committed to implementing any actions deemed necessary to identify, monitor and report those individuals from the College community – among students and staff – who could be drawn into or misled in the path of radicalisation and extremism as a victim as well as someone who could deliberately engage in the process of radicalising a potential victim.

The College safeguarding policy also includes measures to tackle the issues of students' welfare, including those related to unexpected events such as the COVID-19 pandemic since any concerns about someone being drawn into radicalisation and extremist ideology or committing an act of terrorism may also raise welfare considerations. Such considerations may be related to the risk of being vulnerable and easy to be recruited to believe in extremist ideology

The College's approach is guided by the institutional values of inclusiveness, integrity and the commitment to ensure that everyone is treated fairly with dignity and respect, and in a supportive and welcoming environment. The College ensures that all support is directed towards helping staff and students to build resilience to extremism and give them a positive sense of identity through the development of reflective and critical thinking skills.

¹ Prevent duty: Framework for monitoring in Higher education in England 2018-2019 onwards available at <https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards-updated-22-january-2019.pdf>

The College implements any actions, deemed as necessary to identify, monitor and report those individuals from the College community (e.g. students and staff) who could be drawn into or misled in the path of radicalisation and extremism as a victim as well as someone who could deliberately engage in the process of radicalising a potential victim. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff is always challenged and where appropriate dealt in line with College's Disciplinary Policies and Procedures for students and staff.

Safeguarding Procedures

- The College Prevent Lead team consists of trained and skilled members who are capable of identifying, assessing and responding to any situation involving radicalisation and extremism as well as unexpected welfare concerns due to unexpected events such as the pandemic. The Prevent Lead team is also responsible for training the College staff for detection and reporting any actions related to radicalisation and vulnerable students who could be drawn in as a victim.
- It should be noted that the reporting requirements described in this Policy statement are implemented in a proportional manner as well as based on the level of risk perceived by the observer and the Prevent team within the context of local environment.
- The College acknowledges the position that radicalisation and extremism are form of behaviour and acts that may lead to committing terrorism. The statutory Prevent Duty guidance defines extremism as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs and calls for the death of members of our armed forces, whether in this country or overseas”.
- In implementing the safeguarding policy, extreme care will be taken not to challenge the status quo as far as the normal staff and student relationships are concerned. In the rare event that a member of the community faces a serious concern or encounter a situation where another member is potentially being drawn into radicalisation and violent extremism or terrorism, he or she will know where to seek advice and how to respond to the concern.
- When a member raises a concern about an individual in line with the guidelines, the College Prevent Lead team will respond cautiously and sensitively leading to evaluating the individual case carefully. Although some cases, at first, may appear as signs of an individual being drawn to radicalisation, in fact, it may prove to be something else, perhaps, a sign that would tell us he or she may need attention requiring welfare considerations.
- The College recognises that health and safety of vulnerable students and staff is paramount and needs to be protected whilst working online. The College also has a clear policy related to the use of IT by staff and students with a specific reference to Prevent Duty.

- The College uses filtering/firewall systems (IBOS) to prevent staff and students accessing the barred sites such as pornography and extremism in the interest of students' security. This policy covers the use of one's own devices via Wi-Fi.
- Unexpected events such as COVID19 pandemic not only threaten health and safety of students but also raises welfare issues. The College recognises that online teaching during the pandemic and therefore long period of isolation can threaten students' mental health as well. The College has taken all required measures to safeguard students' and staff health & safety and wellbeing, and have communicated to them effectively via College's website, text messages and emails, and on the notice boards. The COVID-19 Plan has been written to reflect on the Government guidelines on level-4 pandemic action plan.
- The College recognises that detection and recognition of an individual being drawn into radicalisation and extremism is a difficult task. Defining attitude and behaviour of an individual that would make us suspect and conclude someone has been, or is being, drawn into radicalisation or terrorism would encourage concerns to be reported as stated in 'Channel Referral and Reporting' section of this policy.
- The Prevent Lead team is aware of the County Lines gangs network penetrating the higher education environment targeting vulnerable young adults. The College recognises that financial hardship and welfare needs of vulnerable students remain an attractive feature for exploitation by the County Lines gangs and therefore necessary measures need to be taken to tackle early on.

Channel Referral and Reporting

- When an individual' attitude and behaviour is found to be suspicious and at imminent risk of harm to himself/herself or others, the observer should contact the principal immediately on the 24hour emergency number: 07956869751 and, in his absence, the Managing Director should be contacted on 07812507863 or call the emergency number 999 (police).
- The observer, if happens to be a student, can also contact a staff member or tutor first in person, if available on site and contact the Principal or the Director on the numbers provided above.
- When the concern is not perceived to be an immediate threat to the individual or others, whether student or staff, the Student Welfare Officer at the College should be contacted by dialling 020 7 377 2800. The Students Welfare Officer is also a member of the Prevent Lead team will then liaise with the principal.
- The Chair of the Prevent Lead team, after consulting with the Board of Management, may refer a concerned or suspected individual to the external authorities through the Safeguarding Referral Channel which includes the Tower Hamlets Prevent Lead team and the police. The established channel of the College is via the Local Authority Prevent Lead contact.

- However, if and when an individual is referred to the Channel Programme, it would be completely voluntary and will not negatively impact them in future such as carrying a criminal record.
- Allegations against or concerns about students and staff, when raised by anonymous individuals, will be subject to investigation to assess the validity of such concerns and allegations before being taken into consideration as a potential threat. Since anyone can make allegations against someone else in bad faith or with a malicious intention, it is extremely necessary that such allegations should be investigated thoroughly for their validity and truthfulness.
- The College may take disciplinary actions against any member of staff or student if proven to have committed a criminal act, including any act of terrorism while working or studying at the College. These acts may lead to expulsion or dismissal through the hearing of the Misconduct Committee.
- The College is obliged to share information with the relevant senior management members, including the Prevent Lead team, and with the respective channel referral members, on matters related to individuals if they were assessed and proved to be at risk of being complicit in a terrorist activity or a victim of being drawn into radicalisation.
- As a result of an initial investigation, if an individual is obliged to participate in subsequent investigations by the police or other statutory authorities, the College will not be able guarantee confidentiality of information being shared.
- The College preserves the record of all internal and external referrals made under the College safeguarding policy. The College is obliged to follow the Data Protection Policy in accordance with the Data Protection Act 1998 when deciding to make any external referrals.

Reporting Serious Incidents

The College will contact the OfS Prevent Adviser when a potential serious incident is identified to discuss how we have responded and what actions have been taken consequently before formally reporting to the OfS. This agrees with the updated framework for the monitoring of the Prevent duty in higher education in England.

Student Welfare and Staff Training in Safeguarding

The College has arranged to provide a range of welfare services and pastoral support which plays a key role in promoting understanding between individuals and groups. The student welfare officer who is also member of the College Prevent Lead team is trained to identify as well as listen to the needs of vulnerable students who would otherwise be subject to victimisation by radical and extremist philosophy and recruiters.

The College has also taken measures to implement the Government COVID-19 action plan such as social distancing and maintaining personal hygiene when inviting students or visitors to

visit the premises. The entire premises have been signposted and equipped to observe preventive measures.

The College has also provided training to both the academic staff and admin personnel to monitor any unusual events and behaviour amongst students and staff and report to the Chair of the Prevent Lead Team. The relevant training materials are made available to the academic and support services staff outlining the requirements of reporting. The College intends to continue the Safeguarding training programmes periodically with the help of Prevent partners