

Safeguarding and Prevent Policy

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| Linked policies and documents: | Anti-Bullying & Anti-Harassment Policy Equality & Diversity Policy Data Protection Policy Staff Handbook Health and Safety General Policy | Policy for External Speakers Academic Freedom Code of Practice and Policy Whistleblowing Policy Student Concerns & Complaints Policy Staff and Students Relationships Policy |
| External reference: | UK Quality Code [March 2018] Guiding Principle 10.1.8 Education organisations and employers acknowledge individuals have unique needs within the education organisation and in the workplace, and collaborate to ensure opportunities are inclusive, safe and supported. Section 26(1) of the Counterterrorism and Security Act 2015, Revised Prevent Duty Guidance July 2015; updated April 2019 UKVI Tier 4 sponsor guidance July 2018 | |
| Audience: | Students, Staff and Visitors | |

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1. Introduction

Oxford Business College (The College) are committed to creating a safe and inclusive environment for all of our students, staff, and visitors. We take seriously our responsibility to safeguard vulnerable individuals and to prevent the risk of harm from a range of threats, including radicalisation and extremism. Our Safeguarding and Prevent Policy sets out our approach to promoting the welfare of all members of our community, and our commitment to meeting our legal and moral obligations in this area. This policy is designed to provide guidance and support to all staff and students, and to ensure that we have a robust framework in place for safeguarding and preventing harm. We believe that everyone has a role to play in safeguarding, and we are committed to working collaboratively with our partners and stakeholders to ensure that our policies and procedures are effective, relevant, and up-to-date.

2. Purpose

To recognise that the College is responsible for the safety of our students, staff and all other stakeholders when they are engaging with College provision, and to respond to current legislation and guidance on Safeguarding and the Prevent duty. Training providers have a common law duty of care to take reasonable steps to ensure that all College stakeholders, particularly vulnerable adults are safe.

3. Scope

This policy covers the safeguarding of vulnerable adults including students, staff, any other stakeholders or members of the public visiting or participating in any activities of the College. College Staff including temporary staff and the Board of Governors have a responsibility towards Safeguarding and Prevent.

The College has a Designated Lead Safeguarding Officer (DLS) and a Lead Prevent Office. College also has campus Safeguarding & PREVENT Officers. The College currently runs no provision for anyone under 18. However, many features of this policy apply to vulnerable adults as well and it is the College policy to follow Safeguarding and Prevent guidance for all students, staff and other stakeholders.

4. Aims & Objectives

Oxford Business College is committed to safeguarding and promoting the welfare of vulnerable people, engaged in whatever capacity across the full range of our activities.

In order to create a safe and secure environment for students, the College has introduced measures to:

- 4.1 proactively promote a safe learning environment and regularly monitor arrangements to ensure this continues.
- 4.2 affirm that it is the College's duty to help staff and students recognise their

responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged.

4.3 have clear procedures for following up issues of conduct for both staff and students in the Staff Handbook, The Academic Misconduct Policy and Student Code of Conduct and Disciplinary Policy.

4.4 Continuously review safety and security in the College

4.5 Require staff and visitors wear ID badges at all times.

4.6 Require that all contractors wear ID badges at all times.

4.7 Abide by safe recruitment guidelines when employing staff.

4.8 Have 24/7 access to key designated Safeguarding contacts.

4.9 Safeguarding in its broadest sense, will be promoted positively using a range of methods including:

4.9.1 Policies and procedures made available on the College website for stakeholders

4.9.2 Training sessions

4.9.3 Student inductions

4.9.4 Awareness raising posters

4.10 Students will be offered support through a range of mechanisms including:

4.10.1 Consideration of individual needs and responding whenever possible

4.10.2 Additional learning support for students with learning difficulties/disabilities

4.10.3 Free access to counselling services

4.10.4 Risk assessments for new/re-enrolling applicants

4.11 The Prevent Lead and Designated Lead Safeguarding Officer (DLS), Head of Student Welfare and Student Support Officers oversee all aspects of Safeguarding within the College by:

4.11.1 Meeting as required to review developments and monitor activities.

4.11.2 Monitoring the volume and types of disclosures.

4.11.3 Reporting to the Academic Board a minimum of four times per annum.

4.11.4 Updating and reviewing the safeguarding policy to meet changing demands and circumstances.

5. Safeguarding students

The College does not currently have students who are under 18. However, should allegations or suspicions of abuse concerning an adult be made at the College, they must be taken seriously by the College, reported and acted upon according to clear guidelines and procedures. Staff cannot commit to confidentiality in cases of suspected abuse and people who allege abuse must be aware that their allegation will need to be reported

officially to the authorities including the police if necessary. Concerns or suspicions must be referred to a designated staff member even if the student's stated wishes are to the contrary, this can be done in person or by telephone and then followed up using the staff referral form and/ or an initial meeting with the designated officer. The designated officer will seek advice from the appropriate agency and agree any further action which may be necessary. This may include a formal referral.

Students are encouraged to report any abuse, or give consent for a report to be made, to an investigating agency. However, they should be made aware that it may be necessary to report the abuse even without their consent.

All members of staff working with vulnerable adults must be alert to the possibility of abuse. Any concerns should be reported to one of the Designated Officers who will decide along with the Director what further action to take.

Additionally, the Senior Management Team must note and draw the attention of staff to criminal offences that may be committed in connection with the welfare of any student, in particular those involving abuse of trust which prohibits staff from engaging in or encouraging sexual activity with students. This policy makes protection responsibilities clear and gives Oxford Business College the ability to dismiss or otherwise discipline employees who fail to comply with this requirement.

The College will consider the allegations of a case without evidence in the first instance if it is suspected/brought to their attention and must record everything in writing. It is the duty of staff to inform about a case, but not to investigate it. It is the role of the Police and Social Services to carry out any investigations.

If staff working for the College have a safeguarding issue brought to their attention, they must prioritise this above all their other duties. The Designated Lead Safeguarding Officer (DLS) will follow the procedures as agreed by the local safeguarding body.

All personal data will be processed in accordance with the requirements of the General Data protection regulation (2018).

6. Safeguarding Students aged 18+

A vulnerable adult is a person aged 18 or over who may be unable to take care of themselves or protect themselves from harm or exploitation (See definitions in appendix 1 for further details).

7. Safeguarding Structure and Responsibilities

8. Control Measures/Procedures

Safeguarding Officers, Prevent Lead (for all campuses), Designated Lead Safeguarding Officer (for all campuses), Head of Staff & Culture and the College Counsellors. They are available on the phone, for online meetings using video conferencing software and for

meetings at the College if required.

Oxford Business College takes the view that all staff and students are required to share responsibility for the protection and safety of any vulnerable adults.

Some staff and students at the College may have occasional contact with under 18s or vulnerable adults during their work, but they will not be responsible for teaching Under 18s. The Head of Staff & Culture, Prevent Leads, Designated Safeguarding Lead and the College Counsellor are the designated persons who are trained to ensure the needs of Safeguarding are met.

All Oxford Business College staff members, contractors and volunteers are advised to minimise physical contact with students, except for reasons of health and safety, or where physical contact may be a necessary part of learning.

Oxford Business College reserves the right to deny employment to individuals where safe recruitment practice suggests they might pose a danger to the learning community.

Oxford Business College reserves the right to suspend and exclude learners involved in incidents relating to other learners' safety and possible bullying and harassment.

Oxford Business College also reserves the right to suspend and/or dismiss staff members in accordance with its employment procedures, from employment or from undertaking a specific role with respect to that employment. This may apply if information was withheld about their criminal record at the point of employment or if a staff member acquires a criminal record during employment.

All members of staff working closely with vulnerable adults must be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to a vulnerable adult should be reported.

DBS disclosures are obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with vulnerable adults. The College will evaluate information to determine an individual's appropriacy to work in such an activity.

Where staff are not engaged in regulated positions but are involved in activities that may involve vulnerable adults, a risk management approach is taken to delivery of learning and teaching, and activities involving the wider public.

Oxford Business College will follow the locally agreed multi-agency procedures.

OXFORD CITY COUNCIL LINK:

<https://www.oxfordshire.gov.uk/cms/content/safeguarding-hub>

SLOUGH COUNCIL LINK:

Safeguarding – Slough Borough Council

NOTTINGHAM COUNCIL LINK:

Safeguarding Children Partnership - Nottingham City Council

WEST LONDON LINK:

Safeguarding_adults_-_keeping_yourself_safe.pdf (westlondon.nhs.uk)

8.1 How to make a referral to relevant Support Services

Information regarding how to respond if a concern about a learner arises is detailed below:

8.1.1 Inform one of Oxford Business College's Designated Officers as soon as possible.

8.1.2 A referral must be made as soon as possible to the Initial Response Service at the local authority.

8.1.3 If a learner is deemed to be at immediate risk the Police should be contacted immediately following which the above referrals can be processed.

9. Procedures for dealing with allegations against staff and other students.

Allegations may be raised through the College's concerns and complaints channels, such as via email, or they may be communicated verbally to a member of staff. Regardless of the mode of communication, the allegation must be reported immediately to the relevant Line Manager or Senior Manager with lead responsibility. Upon receiving the report, the following actions must be taken:

9.1 The recipient of the allegation must provide a written account, detailing the incident, which should be signed and dated. The Line Manager or Senior Manager with lead responsibility must countersign and date the written account.

9.2 Details such as times, dates, locations, and names of potential witnesses should be carefully documented.

9.3 The Prevent Lead and/or the Designated Lead Safeguarding Officer (DLS) must be informed promptly.

9.4 In some circumstances, the College may need to act jointly with other organisations. The DLS will conduct an initial assessment of the allegation, consulting with appropriate external bodies such as the Office for Students (OfS), the Education Child Protection Unit, Social Care, the Local Authority Designated Officer (LADO), and/or the Police, as necessary.

9.5 If the allegation involves a potential criminal act or suggests that a vulnerable adult has suffered, is suffering, or is likely to suffer significant harm, the matter must be reported immediately to Social Care, the Police, and the OfS.

9.6 Safeguarding enquiries by Social Care or the Police must be distinguished from internal disciplinary investigations. While the College may use the findings of external enquiries to inform its own procedures, it must provide full assistance to the relevant agencies.

9.7 The College will suspend its internal enquiries while formal Police or Social Care

investigations are ongoing to avoid prejudicing these investigations. Any subsequent internal procedures will adhere to the College's staff disciplinary policies.

9.8 When external agencies, such as the Police, are involved, inter-agency strategy discussions are usually required. The manager with lead responsibility will ensure that the College cooperates fully and maintains appropriate confidentiality throughout the process.

9.9 Staff members facing allegations should be advised to seek representation or support, such as from a trade union or a legal adviser, to ensure their interests are protected.

By adhering to these procedures, Oxford Business College ensures that all allegations are handled with the utmost seriousness, sensitivity, and compliance with safeguarding standards.

9.10 The manager with lead responsibility will consult with the police or other investigating agency (e.g. social care), particularly in relation to timing and content of the information to be provided, and shall:

9.10.1 Inform the student who is alleging that the allegation is being investigated and explain what the process will likely involve.

9.10.2 Inform the member of staff against whom the allegation has been made that the investigation is taking place and what the process will likely involve.

9.10.3 Inform the Head of Staff & Culture of the allegation and the investigation.

The manager with lead responsibility shall keep written records of action taken in connection with the allegation.

10. Suspension of Staff

Suspension is a neutral measure that can be introduced at any stage of an investigation and should only be implemented for a good reason. It is not a disciplinary action and involves full pay. Alternatives to suspension may include paid leave of absence or changes to specific duties. Suspension may be considered when a student is at risk, allegations are potentially severe enough to justify dismissal, or for the efficient conduct of the inquiry.

Suspension will be applied in line with the Staff Code of Conduct in the Staff Handbook.

11. Records

It is important that documents relating to an allegation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed of Oxford Business College's statutory duty to inform the Secretary of State for Education under the 'ISA' procedures.

False allegations may be indicative of problems of abuse elsewhere. A record should be kept, and consideration given to referral to Social Care or other agencies so that other agencies may act upon the information.

In consultation with the manager with lead responsibility the Head of Staff & Culture shall:

10.1 Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary action will be taken. Consideration should be given to offering counselling/support

10.2 Consider informing the student if the allegation was made by a student other than the alleged victim

10.3 Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming what action had been taken

Key Contacts for all safeguarding related issues:

- Prevent Lead/Designated Lead Safeguarding Officer:
Salman Haq – 07888337830 – Salman.haq@obc.ac.uk
- Head of Staff & Culture
Tim Mitchell – 07859075400– hr@obc.ac.uk
- College Counsellor
Lynda Plenty – 07888327649 – lynda.plenty@obc.ac.uk

Campus Contacts

Park Royal Campus, London

- Michelle Baxter – Michelle.baxter@obc.ac.uk

Slough

- Rana Abosharkh – rana.abosharkh@obc.ac.uk

Oxford Kings Mead House

- Diana Munoz – Diana.munoz@obc.ac.uk

George Street, Oxford Campus

- Paulo Ciechanovicz - academic.data@obc.ac.uk

Ruskins College, Oxford Campus

- Paige Shirley – paige.shirley@obc.ac.uk

Nottingham Campus

- Bilal Bukhari - bilal.bukhari@obc.ac.uk

Brentford Campus

- Anoushka Abbimane - anoushka.abbimane@obc.ac.uk

A good working relationship between staff and students depends to a large extent on the establishment of trust.

This may be described as a confidential relationship. However, guarantees of absolute

confidentiality should never be given. If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break a perceived confidence.

12.Prevent

Disclosures regarding students and staff who display or espouse values contrary to accepted British values should follow the same process as that used for responding to allegations of abuse by recording and reporting to the Prevent Lead who is also the DLS. The overall Prevent Lead and DLS for all campuses reports to the Head of Qualpliance & Legal Affairs on all matters pertaining to Prevent and Safeguarding in all campuses at the College. In addition to the overall Prevent Lead, there are Prevent and Safeguarding Officers in every campus who report to the Overall Prevent Lead/DLS.

The accepted British values for the purposes of the Prevent duty include:

- The rule of law
- Democracy
- Individual liberty
- Respect and tolerance

Extremism is defined by the UK Government as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

In instances where the designated person is informed of an individual's or group's potential for extremism and radicalisation, the designated person will refer the concern and information to:

13.Prevent Lead (All Campus)

Email: prevent@obc.ac.uk

Telephone: 07888337830

14. Council contacts for referrals

Slough: [Prevent – Slough Borough Council](#)

London: [Prevent | Metropolitan Police](#)

Oxford: [Safeguarding vulnerable people from extremism | Oxfordshire County Council](#)

Nottingham: [Prevent Duty - Nottingham City Council](#)

15.Preventing violent extremism

College staff are the 'front line' and can identify early signs. Our duty, as of 1st August 2018 includes:

16.External Speakers and Events

In order to comply with the Prevent duty, The Academic Freedom Code of Practice and Policy Statement is to be referred to. This is in place for the management of events held on the College premises or an event in a public place where the College is the whole or part of the organising body. Procedures in the Academic Freedom Code of Practice and Policy apply to all staff, students and visitors and clearly set out what is required for any event to proceed.

The College needs to balance its legal duties in terms of both ensuring freedom of speech and protecting student and staff welfare. Encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. The College does not provide a platform for these offences to be committed.

Furthermore, when deciding whether to host a speaker, the College considers carefully if the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event should not be allowed to proceed except where the designated responsible persons are entirely convinced that such risk can be fully mitigated without cancellation of the event. This includes ensuring that, where any event is being allowed to proceed, speakers with extremist views that could draw people into terrorism are challenged with opposing views as part of that same event, rather than in a separate forum. Where institutions are in any doubt that the risk cannot be fully mitigated, they should exercise caution and not allow the event to proceed.

A Risk Assessment form is used for assessing and rating risks associated with any planned events. This tool provides analysis that will help to decide if an event should proceed, be cancelled or whether action is required to mitigate any risk. This is to be signed by the External Speaker in adherence to the Academic Freedom Speech Code of Practice and this College Safeguarding and Prevent Policy. The form is signed by the Head of Academics for final approval and a digital copy uploaded in the Prevent file.

17.Radicalised Students

Radicalised students can also act as a focal point for further radicalisation through personal contact with fellow students and through their social media activity. Where radicalisation happens off campus, the student concerned may well share his or her issues with other students. Changes in behaviour and outlook may be visible to staff. Much of the guidance, therefore, addresses the need for the College to carry out self-assessment to identify the level of risk. The self-assessment will also ensure that all staff have access to training, and

that there is welfare support for students and effective IT policies in place which ensure that any behavioural signs indicating radicalisation can be recognised and responded to appropriately.

18. Partnership

In complying with this duty we can expect active engagement by the Board of Governors and Senior Management Team with other agencies including:

- The Police
- BIS regional higher and further education Prevent coordinator
- The College affirms that it will:
 - Engage and consult students on plans for implementing the duty
 - Have a single point of contact - the Prevent Lead for operational delivery of Prevent related activity

19. Risk assessment

The College will carry out risk assessments which assess where and how students, staff or visitors may be at risk of being drawn into terrorism. These policies and procedures are in place to ensure we can identify and support individuals at risk.

Risk assessment looks at institutional policies regarding the College premises and student welfare, including equality and diversity, and the safety and welfare of students and staff. Risk assessment will address the management of the College, including policies and procedures for events held by staff, students or visitors, and relationships with external bodies and community groups who may use College premises, or work in partnership with the College.

The College has clear and visible policies and procedures for managing whistleblowing and complaints.

New policies are approved by the Board of Governance (BoG) and the Senior Management Team or Academic Board (SMT) approves all policy updates. All Boards meet on a quarterly basis where they can offer regular guidance and assessment of college policies.

20. Staff Training

The College will undertake appropriate training and development for key stakeholders including tutors. This will enable tutors to educate their students about Prevent issues. The College encourages students to respect other people, especially regarding the protected characteristics set out in the Equality Act 2010. The Prevent lead must ensure appropriate training is conducted by all staff and digital copies of certificates are kept by the HR Manager.

Members of staff should understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups

and can purport to legitimise terrorist activity. Such staff should have enough training to be able to recognise this vulnerability and be aware of what action to take in response. This will include an understanding of when to make referrals to the Channel programme and where to get additional advice and support.

21.IT Policy

The College has a policy around general usage, covering what is and is not permissible, which also contains specific reference to the Prevent duty. Use of filtering is required as a means of restricting access to harmful content, and the use of filters is used as part of an overall strategy to prevent people from being drawn into terrorism.

The College does not have any course that requires using IT equipment to research terrorism and counter terrorism during their learning.

Appendix 1. Definitions

Child - in accordance with The Children Act 1989, and therefore in accordance with law, the College shall regard any young person below the age of 18 as a child.

Child abuse - may be physical, sexual or emotional abuse, or neglect

Designated person(s) - the staff member(s) designated by the SMT as having responsibility for liaising with the investigating agencies.

Domestic violence – can be physical, emotional, sexual, neglect. This category also covers forced marriages and honour-based violence.

Emotional abuse - the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyberbullying. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

Neglect - neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, a child's basic emotional/physical needs. It can include not protecting a child from emotional harm or danger.

Physical abuse - actual or likely physical injury to a child, or failure to prevent injury may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

Risk to self and/or others – this may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, or emotional trauma and/or stress.

Safeguarding - includes promotion of health and well-being as well as protection of specific individuals.

Sexual abuse - actual or likely sexual exploitation of a child, including prostitution involving forcing or enticing a child or young person to take part in sexual activities, whether or not a child is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the child

looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the child to behave in sexually inappropriate ways. It can include grooming a child in preparation for abuse.

Significant harm - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child).

If there are reasonable grounds to suspect that a child is suffering or is likely to suffer Significant Harm, a Section 47 Enquiry and Core Assessment are initiated. This normally occurs after an Initial Assessment and a Strategy Discussion.

Section 47 Enquiries are usually conducted by a Social Worker, jointly with the Police, and must be completed within 15 days of a Strategy Discussion. Where concerns are substantiated and the child is judged to be at continued risk of Significant Harm, a Child Protection Conference should be convened.

Student – the term student for this policy covers students at the College. In addition, it covers students visiting the College or on taster programmes.

Vulnerable Adult – is a person aged 18 or over who 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. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities, or if they are old and frail. It can include those who are vulnerable due to other circumstances such as being an asylum seeker. In addition, it can include those under a probation order or those who may be experiencing problems due to alcohol or drugs.

However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and also that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

Appendix 2. Referral Form

| Safeguarding or Prevent Referral Form | | | |
|---|--|---|--|
| Staff completing the form | | Date | |
| Person reporting the concern or suspicion | | Date or report | |
| Staff it is referred to | | External referrals if any (e.g. Police) | |
| <p>Details of the incident (this is not an investigation, only a report of what is being referred)</p> | | | |