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Equality Impact Assessment Form

The completion of the Equality Impact Assessment (EIA) will help us to ensure that our policies, procedures and practices do not discriminate or disadvantage people and also improve or promote equality.

In relation to age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
Please explain if you identified any inequalities or possible discrimination in the policy, procedure or practice?
No negative impact on any of the equality strands identified in the procedure.
If identified, how have you changed the policy, procedure or practice to remove or mitigate the inequality or discrimination?
Not Applicable
Any follow up actions required?
Not Applicable

1. INTRODUCTION

Safeguarding is everyone's responsibility. Requirements apply to children, young people (under 18), and adults at risk (18+).

Swarthmore is committed to:

- Protecting children, young people and adults at risk from maltreatment, neglect, exploitation, misinformation, disinformation, and harmful online activity (including AI-generated or manipulated content).
- Promoting health, well-being and resilience.
- Ensuring that students feel safe, know how to report concerns, and are listened to.
- Acting quickly and recording all concerns in line with statutory guidance.

Safeguarding adults at risk

The Care Act 2014 provides a legal framework for how local authorities and other parts of the health and care system should protect adults at risk of abuse or neglect. Most of the principles and procedures that apply are the same as those for safeguarding children and young people. Safeguarding adults at risk means:

- Protecting an adult's right to live in safety, free from abuse, neglect and exploitation.
- People and organisations working together to prevent and stop both the risk and experience of abuse, neglect and exploitation.

What is Safeguarding?

Safeguarding means:

- Protecting children, young people and adults at risk from abuse, neglect, exploitation and online harms.
- Promoting the best outcomes in life.
- Creating a culture of vigilance and early help.

Online safeguarding includes risks associated with misinformation, disinformation and conspiracy content.

Staff should recognise digital manipulation and understand emerging risks including AI-generated or manipulated material.

Early help, family help and positive intervention

Staff should be proactive in identifying emerging concerns and know how to report these through Swarthmore's safeguarding processes. Children and families may benefit from universal services and community based early help or, where appropriate, targeted support through Family Help. The DSL will consider and action any further interventions or referrals as required.

Swarthmore is committed to ensuring:

- Students are and feel safe.
- Students know how to complain and are confident in doing so.
- The organisation gives a strong, robust and proactive response to concerns.
- Staff know and understand safeguarding indicators and know how to report concerns.
- Staff complete regular CPD in relation to Safeguarding and Prevent.
- We provide a safe physical environment.
- There is a Confidential Reporting (Whistle Blowing) Policy and staff are made aware of it.

Swarthmore is committed to developing and promoting positive resilience amongst all our students by developing and encouraging:

- Good communication skills.
- Independence.
- Self-confidence.
- Self-reliance.
- Ability to make autonomous decisions.
- Physically active.
- Emotional self-regulation.
- Problem-solving skills.
- Good social and peer networks.
- Can moderate own behaviour and behave appropriately.
- Positive relationships with others.
- Actively engaging in learning.
- Access to positive role models.
- Reflection and perspective: seeing things from different points of view and learning from experiences.

Swarthmore aims to provide a ‘safe space’ in which children, young people and adults at risk can feel confident to speak out about their experiences and ask for help by:

- Creating a positive culture around safeguarding.
- Building a culture of listening and trust.
- Having clear policies and procedures and pathways to report, with good promotion of who the safeguarding staff are.
- Helping everyone understand what abuse and harm is and their roles and responsibilities in identifying and reporting it.
- Creating a culture of ‘What if I am right?’ rather than ‘What if I am wrong?’
- Promoting a culture of ‘early help’ and positive intervention.

Supporting SEND learners:

Learners with SEND may face additional barriers to disclosure. Staff must:

- Recognise that changes in behaviour may indicate distress or abuse.
- Adapt communication to individual needs.
- Be aware that children with SEND may experience additional barriers to recognising or reporting abuse, and avoid assumptions that changes in behaviour, mood or presentation are related solely to their SEND or disability.
- Remain alert to contextual and “mate crime” risks.
- Record all observed changes or disclosures and share promptly with the DSL.

Swarthmore is committed to the three Rs relating to our Safeguarding responsibilities - Recognise, Record, Report:

Recognise – identify indicators of harm or distress.

Record – make clear, factual records using the learner’s own words. Record the decision rationale.

Report – pass concerns immediately to the DSL or Deputy DSL.

Teachers and TAs must be especially vigilant due to their close daily contact with learners.

The DSL maintains oversight of all safeguarding activity, oversees online filtering and monitoring systems, and provides reports to Trustees on safeguarding activity, training, and compliance.

2. AIMS:

Swarthmore aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote all students' welfare.
- All staff are aware of their statutory duties with respect to safeguarding including Volunteers, Trustees, freelance and sessional staff.
- Staff are trained in recognising and reporting safeguarding issues, whether online or offline.
- Systems for reporting abuse are promoted, easily understood and accessible.
- Students know how to complain, feel confident in doing so, and know who to contact.
- Online and offline safeguarding risks are understood, including emerging harms (AI generated deepfakes, conspiracy theories, misinformation/disinformation).
- Equality, Diversity and Inclusion are promoted, recognising that some students may face additional barriers to disclosure and protection.

Equality Statement:

Swarthmore is aware that some groups may have an increased risk of abuse, and additional barriers can exist in respect to recognising and disclosing. We are committed to anti discriminatory practice and recognise everyone's diverse circumstances. We ensure that all students have the same protection regardless of any barriers they may face. This may include: those with additional educational needs or disabilities; young carers; discrimination based on race, ethnicity, disability, religion, gender reassignment, sex or sexual orientation; have English as an additional language; those known to be living in difficult situations such as temporary accommodation or where there are issues such as substance abuse or domestic violence; those at risk of FGM, sexual exploitation, forced marriage or radicalisation; asylum seekers; children in care.

KCSIE 2026 also highlights that children with medical conditions may face additional safeguarding challenges; staff should remain alert to these where relevant.

This policy has been developed in accordance with (but not limited to) the following legislation:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children (2026)
- Children Act 1989 & 2004
- Care Act 2014
- Education Act 2002 & 2011 (Section 175 duty)
- Counter-Terrorism and Security Act 2015 & Prevent Duty Guidance (updated 2023)
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Equality Act 2010
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- RSHE Statutory Guidance (2025, implementation required September 2026)
- Children's Wellbeing and Schools Act 2026
- SEND code of practice.

Swarthmore Trustee Council takes seriously its responsibility under the Education Act 2002 and 2011 to safeguard and promote the welfare of vulnerable people. They will work together with other agencies to ensure there are adequate arrangements within the Centre to identify, assess, and support those children and vulnerable adults who are suffering harm.

It also acknowledges its responsibility under the Counter Terrorism and Security Act and Prevent Duty (2015, updated 2023) to protect young people and vulnerable adults who could be drawn into violent extremist activity. The governing body understands its duty in regard to the reporting procedures concerning The Female Genital Mutilation (FGM) Act 2003 as amended by the Serious Crime Act 2015.

Safeguarding is about preventing and responding to concerns of abuse, harm, neglect or exploitation of vulnerable adults and children. We recognise that all staff and Trustees have a full and active part to play in protecting our students from harm and that their welfare is our paramount concern.

This policy covers all students, staff, volunteers and trustees at Swarthmore.

Swarthmore endeavours to provide a safe, caring, positive and stimulating learning environment for all students. We will empower students to create communities that are more resilient to extremism and protect the well-being of particular students or groups who may be vulnerable, promoting and reinforcing shared British values whilst creating space for open debate. Swarthmore will:

- Provide information and support in accessible ways to help adults and young people understand what abuse is and how it happens, how to stay safe and how to raise a concern about the safety or well-being of an adult or child.
- Provide an environment in which staff and students feel safe, secure, valued and respected, and feel confident and know how to access help if they are in difficulties.
- Raise the awareness of all staff of the need to safeguard children and students and of their responsibilities in identifying and reporting possible cases of abuse, radicalisation, and engagement in violent and/or coercive extremism.
- Participate in raising public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse including FGM, neglect, general intolerance, radicalisation, and engagement in violent and/or coercive extremism.
- Acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding students and children.
- Develop a structured procedure within Swarthmore, which will be followed by all members of staff in cases of suspected abuse, radicalisation or engaging in violent and/or coercive extremism.
- Develop effective working relationships with all other agencies involved in safeguarding children, young people, adults with learning difficulties and others.
- Comply with safer recruitment guidelines.

3. PROCEDURES

Swarthmore procedures for safeguarding students, children and vulnerable people will be in line with the Local Authority arrangements.

We will ensure that:

- The Trustee Board understands and fulfils its safeguarding responsibilities and will appoint a named Trustee Lead with Safeguarding responsibilities.
- A senior member of the leadership team will be the Designated Lead for Safeguarding.
- Individuals from the management team or Safeguarding team will substitute for the Designated Lead when required and will have received training and been briefed in this role.
- Arrangements will ensure that safeguarding concerns continue to be received, monitored and acted upon promptly when the DSL is unavailable.
- All new members of staff, Volunteers and Trustees will complete essential Safeguarding training which includes Prevent as part of their induction programme. Refresher Safeguarding training will be completed by all staff and Trustees every three years. Relevant updates will be shared by DSL.
- In addition, safeguarding and child protection updates, including online safety, will be provided as required and at least annually. All staff will read Part One of the current Keeping Children Safe in Education guidance and will be supported to understand their safeguarding responsibilities.
- All members of staff, Volunteers and Trustees know how to respond to a student who discloses abuse or a safeguarding concern, and the procedure to be followed to appropriately share this information.
- All students are made aware of Swarthmore's responsibilities regarding a vulnerable person's protection procedures through publication of Swarthmore's Safeguarding Policy and inclusion in the student induction programme.
- Pre-employment checks to determine staff suitability will be undertaken for all staff recruited to work for the Swarthmore Centre and the appointment will not be confirmed until satisfactory checks have been completed, as per our Safer Recruitment Policy. These checks will include references and eligibility checks; Barred List and Enhanced Disclosure & Barring Service Checks (formerly Criminal Records Bureau Checks). A Barred List check and an Enhanced Disclosure & Barring Service check will be undertaken for any person recruited to work in a regulated activity.

Regulated activity at Swarthmore will include:

- ✓ Tutors on Family Learning programmes.
 - ✓ Tutors on programmes with learners aged 16-18 and, where applicable, adults at risk.
 - ✓ Tutors on any other programmes which fall within the definition of regulated activity.
 - ✓ Any other staff who may be in contact with the above in their day-to-day work.
 - ✓ Volunteer and paid roles involving children will be assessed in accordance with the current definition of regulated activity. From 1 September 2026, the former supervision exemption no longer applies. The nature and frequency of the activity will be considered, and appropriate DBS and Children's Barred List checks will be undertaken where required.
- Our procedures will be reviewed and updated annually, or sooner, in response to new guidance.
 - Induction for all staff, volunteers and Trustees will include the Safeguarding Policy and Procedures, the name and contact details of the Designated Lead and Deputy Safeguarding Lead, and they will be given a copy of the Staff Handbook to reinforce this.

4. RESPONSIBILITIES

Swarthmore recognises that it is an agent of referral and not of investigation. It is not the Centre's responsibility to investigate abuse.

We have a Designated Lead who is responsible for:

- Referring a vulnerable student if there are concerns about their welfare, possible abuse, neglect or exploitation to the Local Adult or Children's Safeguarding Board (whichever is relevant to the case) using the stipulated referral procedure as soon as possible within the working day. Any person identified as being at risk of becoming involved in violent and/or coercive extremism is referred to the Leeds Prevent Team (01132413386 / prevent@leeds.gov.uk).
- Ensuring that detailed and accurate written records of concerns about a vulnerable student are kept, even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely.
- Acting as a focal point for staff concerns and liaising with other agencies and professionals.
- Keeping themselves up to date with knowledge to enable them to fulfil their role, including attending all required essential training provided by the appropriate body.

5. SUPPORTING CHILDREN AND VULNERABLE ADULTS

Swarthmore will support all children and vulnerable students by:

- Encouraging the development of self-esteem and resilience through the curriculum.
- Promoting a caring safe and positive environment within Swarthmore.
- Encourage resilience, reporting and self-advocacy.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and vulnerable students.
- Notifying Social Care, Safeguarding Team or Prevent Co-ordinators as soon as there is a significant concern.

6. CONFIDENTIALITY

We recognise that all matters relating to safeguarding and child and student's protection are confidential.

The Designated Lead will disclose personal information about a child or student to other members of staff on a need-to-know basis only.

However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and vulnerable students.

Data protection law does not prevent the appropriate sharing of information for safeguarding purposes. Staff should not allow concerns about data protection to prevent necessary and proportionate information sharing where someone may be at risk of harm. Consideration should be given to the risks of both sharing and not sharing information.

All staff must be aware that they cannot promise a child, young person or student to keep secrets which might compromise safety or well-being or that of another.

We will always undertake to share our intention to refer a child or young person to Social Services with their parents/carers unless to do so could put the child or young person at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Education Welfare Service or Social Services on this point.

7. SUPPORTING STAFF

We recognise that staff working at Swarthmore who have become involved with a child or student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the Designated Lead and to seek further support. This could be provided for all staff by, for example, Occupational Health and/or a tutor as appropriate.

Staff should have access to up-to-date advice on the boundaries of appropriate professional behaviour. Our setting adopts the latest guidance — including the Safer Recruitment Consortium's Guidance for Safer Working Practice for those working in education settings (2022) — which sets out the circumstances to be avoided in order to limit complaints or allegations of abuse of trust and/or physical or sexual misconduct. All staff working with children, young people (under 18) and adults at risk must review this guidance and understand it in conjunction with our Code of Conduct, the latest Keeping Children Safe in Education (KCSIE) 2026 and the Care Act 2014 adult safeguarding framework.

We recognise that designated staff should have access to support and appropriate workshops, courses or meetings as organised by Swarthmore and/or the Local Authority.

8. ALLEGATIONS AGAINST STAFF

The procedures in this section apply to safeguarding concerns or allegations relating to staff, volunteers, contractors, agency staff, freelance or sessional staff, trainee teachers and other adults working on behalf of Swarthmore.

All staff should take care not to place themselves in a vulnerable position with a child or student. It is always strongly recommended that interviews or work with individual children, young people, students or parents be conducted in view of other adults.

We understand that a child or student may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Director or the most senior member of staff if the Director is not present.

The Director, on all such occasions, will discuss the content of the allegation with the Safeguarding Lead or Trustee.

If the allegation made to a member of staff concerns the Director, the person receiving the allegation will immediately inform the Chair of Trustees who will take appropriate and immediate action without notifying the Director first.

Swarthmore will follow the appropriate procedures for managing allegations against staff:

- Where a concern does not meet the harm threshold but may indicate that an adult has acted in a way that is inconsistent with the Staff Code of Conduct, it will be considered and recorded as a low-level concern in accordance with Swarthmore's procedures.

- Suspension of the member of staff against whom an allegation has been made needs careful consideration and we will consult in making this decision.

9. WHISTLEBLOWING

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the Chair of Trustees or the Designated Safeguarding Lead.

10. PHYSICAL INTERVENTION / POSITIVE HANDLING

Staff must only ever use physical intervention as a last resort and when other de-escalation strategies have failed or would be inappropriate given the imminent risk. At all times, any intervention must be lawful, necessary and proportionate and the force used must be the minimum necessary to prevent injury, maintain order or prevent damage. Any intervention must be used for the shortest possible time, taking account of the student's age, size, understanding, SEND or disability, communication needs, medical needs and any known trauma. Physical intervention must never be used as punishment.

Such events should be recorded and signed by a witness.

We understand that physical intervention of a nature which causes injury or distress to a child or young person may be considered under child protection or disciplinary procedures.

11. ANTI-BULLYING

Swarthmore takes all forms of bullying seriously and acknowledges that to allow or condone bullying may lead to consideration under child and young person's protection procedures, or disciplinary procedures as appropriate.

12. RACIST INCIDENTS

Our policy on racist incidents is embedded in other policies and acknowledges that racist incidents may lead to consideration under equality protection procedures, and result in suspension and permanent exclusion/dismissal

13. PREVENTION

We recognise that Swarthmore plays a significant part in the prevention of harm to our students by providing them with effective lines of communication with trusted adults and a culture of safety and protection.

Swarthmore will therefore:

- Establish and maintain a culture which is understood by all staff, which enables students to feel secure and encourages them to talk, knowing that they will be listened to.
- Ensure users of the Centre know who they can approach if they are worried or in difficulty.
- Provide curriculum opportunities which equip students with the skills they need to stay safe from harm and to know who they should turn for help.
- Ensure there are opportunities in the curriculum to promote British Values to students. British Values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs." (Prevent duty guidance).

14. HEALTH & SAFETY

Our Health & Safety Policy and IT Users Policy set out in separate documents the consideration we give to the protection of our students both physically and, for example, in relation to internet use and trips and visits.

15. CHILDREN AND YOUNG PEOPLE ON SITE

Swarthmore is an adult education service. As a result, the presence of individuals under the age of 18 is covered by two distinct protocols:

- Young People (16-18 Study Programme Students): Individuals aged 16 to 18 who are formally enrolled in a course or study programme and are attending the Centre independently.
- Children: Individuals under the age of 18 (including those under 16) who are on site temporarily, such as those attending family learning classes, using public areas (e.g., the café), or accompanying an adult.

Protocols for Young People (16-18 Study Programme Students)

- All 16-18 students are treated as independent learners but remain legally defined as children.
- They are subject to the Centre's Code of Conduct and safeguarding procedures.
- Staff must adhere to all aspects of the Centre's safeguarding policy when interacting with 16-18 students, including professional boundaries.
- For the purpose of supervision and movement, these students are not considered 'unattended'. However, if a 16-18 student is found in distress, alone, or is missing from class, standard safeguarding procedures must be followed.

Protocols for Children (Under 18s on Site with an Accompanying Adult)

- Children must only be on site if attending a specific course, family learning class, or using public areas (e.g., the café).
- Responsibility and Supervision: Children are the direct responsibility of the accompanying adult/parent/guardian at all times while in the Centre.

Protocols for Children (Under 18s on Site with an Accompanying Adult)

- If the child is too sick for school or has an infectious illness, they must not be brought into the Centre.
- Children must not be left alone at any time while in the Centre.
- Parents/guardians must accompany their children to the toilet.
- Teaching staff may not bring their own children into classrooms when they are teaching.

Unattended Children/Welfare Concern Protocol

It is the responsibility of all staff to report an unattended child (under 16) or a young person (16-18 student) whose welfare is of concern to a designated manager.

Procedure for Unattended Child (Under 16):

- The manager should ascertain the name of the child and the parent/guardian.
- The parent/guardian should be contacted immediately and asked to attend to or remove the child from the premises.
- Staff should never remain alone with an unattended child unless they are in a public space, such as the café, where they are visible to others. In a non-public area, another member of staff must be asked to be present (where possible).
- No physical contact should be made with the child unless it is a necessary part of an emergency positive handling/reasonable force intervention.
- The matter must be reported as a safeguarding incident and logged according to established procedure.

16. PREVENT – Radicalisation and Terrorism

The statutory duty requires Swarthmore to have due regard to the need to prevent people from being drawn into terrorism. The overall aim of the Prevent strategy is to stop people from becoming terrorists or supporting terrorism.

Definitions:

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is defined as the use or threat of action designed to influence the government or intimidate the public, made for the purpose of advancing a political, religious, racial or ideological cause.

Our Commitment and Responsibilities:

- Swarthmore promotes British Values (Democracy, the Rule of Law, Individual Liberty, and Mutual Respect and Tolerance for those with different faiths and beliefs) and provides a safe space for debate.
- We actively work to reduce permissive environments by ensuring our policies on IT usage, social media, and External Speakers mitigate the risk of learners or staff being exposed to or promoting radicalising influences.
- **Staff Training:** All staff must undertake up-to-date Prevent Awareness training and receive regular refresher training, at least every three years. Leads with designated Prevent responsibilities will receive more in-depth training. DSL will share any relevant updates and changes as necessary.

Reporting a Concern:

- If staff are concerned about a change in behaviour or view an individual (learner or colleague) as potentially susceptible to being drawn into terrorism or supporting terrorism, they must immediately seek advice from the Designated Safeguarding Lead (DSL).
- Any concern relating to a risk of radicalisation will be treated as a safeguarding matter. The DSL will assess the risk and, if appropriate, make a Prevent referral to the Police/Channel as part of the multi-agency safeguarding process.
- Staff must remain vigilant and aware of the nature of risk to learners and the support available via the DSL and the Channel Programme.

17. CHILD-ON-CHILD ABUSE (including harassment and violence)

Swarthmore has a zero-tolerance approach to all forms of child-on-child abuse, which is never to be dismissed as 'banter' or 'part of growing up'. All concerns raised are taken seriously and will be addressed through our formal safeguarding procedures.

Child-on-child abuse covers a spectrum of harmful behaviours, including, but not limited to:

- Bullying (including online bullying, prejudice-based and discriminatory bullying).
- Physical abuse, serious violence or threats, including those involving weapons, and initiation ceremonies.
- Harmful sexual behaviour, sexual harassment and sexual violence.
- The making or sharing of nude or semi-nude images, including images altered or generated using AI or deepfake technology.
- Abuse in intimate personal relationships (often referred to as teen/youth relationship abuse).
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).

Staff Responsibility:

- It is not the responsibility of education staff to investigate any reports of abuse.
- Staff must listen to the disclosure, make a factual record of what was said, seen, or reported, and report the concern immediately to the Designated Safeguarding Lead (DSL).
- Staff must never promise a child confidentiality as this may hinder the DSL's ability to act in the child's best interest.
- All reports must be recorded and reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). In the absence of both, the concern must be immediately escalated to the Safeguarding Trustee Lead.

18. ONLINE SAFETY AND DIGITAL CONDUCT

Swarthmore is committed to providing a safe digital environment in line with Keeping Children Safe in Education (KCSIE) 2026 and the DfE's filtering and monitoring standards. We recognise that safeguarding extends to the online world, both within and outside the Centre.

Staff Roles and Responsibilities

All staff must be aware of their role in promoting online safety and be vigilant to potential online risks. Staff must:

- Model Responsible Digital Conduct and adhere strictly to the Centre's Staff Code of Conduct.
- Never contact learners via personal devices, private social media, or personal email/messaging applications.
- Complete and update online safety and Prevent training, ensuring knowledge of evolving risks.
- Be alert to the Four C's of Online Risk (Content, Contact, Conduct, Commerce), including misinformation, disinformation, conspiracy theories, grooming, cyberbullying, sexual violence, exploitation and emerging risks associated with generative AI, including harmful AI interactions and AI-generated or manipulated content.
- Understand that filtering and monitoring systems are a tool, and staff vigilance and professional curiosity remain the most important safeguards.

Filtering and Monitoring (Statutory Duty)

Swarthmore uses 'Classroom Cloud' as the designated filtering and monitoring solution for all Centre-provided IT access. The Centre's approach to digital safety meets the DfE's standards and includes:

- **Designated Oversight:** The Designated Safeguarding Lead (DSL) holds overall responsibility for the strategic oversight, effectiveness, and compliance of the filtering and monitoring system. The Deputy DSL (DDSL) and the Finance and Services Manager support the day-to-day operation and technical assurance.
- **Active Monitoring and Alerts:** The system is set up to identify and alert to current safeguarding harms and risks, including, but not limited to adult content, illegal content, bullying, cybersecurity, drugs, gambling, grooming, discrimination, radicalisation, extremism, hate speech, self-harm, violence, and suicide. This includes content identified in emails, browser history, internal messages (e.g., Teams), and typed documents.
- **Daily Review and Prioritisation:** Alerts are reviewed and interpreted daily by the DSL/DDSL team. All alerts relating to a high-risk category are investigated and prioritised for prompt intervention and support, with appropriate referrals made to external agencies as necessary.
- **Compliance and Review:** The effectiveness of filtering and monitoring systems will be formally reviewed at least once every academic year, and sooner following a significant safeguarding incident, system change or identified weakness. A record of the review and any actions required will be maintained. The Centre holds Cyber Essentials Plus accreditation, demonstrating a commitment to robust cyber security standards.

The policy applies to all users of the Centre's IT infrastructure, including students, staff and visitors, and appropriate action will be taken for any breach that results in a safeguarding concern.

19. POLICY REVIEW

Swarthmore Trustee Council is responsible for ensuring the annual review of the Safeguarding and Prevent Policy.

Summary of Key Legal and Policy Framework

Swarthmore's Safeguarding and Prevent Policy is underpinned by the following legislation, statutory and non-statutory guidance:

- Keeping Children Safe in Education (KCSIE) 2026
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
Statutory guidance for schools and colleges on safeguarding children and safer recruitment. All staff must read Part One; DSLs should also be familiar with Annex B.
- <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
Working Together to Safeguard Children (March 2026)
Statutory multi-agency framework for safeguarding and promoting children's welfare.
- Children's Wellbeing and Schools Act 2026
Introduces further measures relating to children's wellbeing, safeguarding and education.
- Children Acts 1989 and 2004
<https://www.legislation.gov.uk/ukpga/2004/31/contents>
Core legislation establishing local safeguarding responsibilities and children's rights.
- Education Act 2002 (section 175)
<https://www.legislation.gov.uk/ukpga/2002/32/contents>
Places a duty on FE governing bodies to make arrangements for safeguarding learners.
- Ofsted Education Inspection Framework and FE & Skills Inspection Toolkit (2026)
Sets out inspection expectations and evaluation areas for safeguarding and well-being in FE provision.
- Care Act 2014
<https://www.legislation.gov.uk/ukpga/2014/23/contents>
Statutory duties to protect adults at risk of abuse or neglect.
- Safeguarding Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
Establishes the DBS vetting and barring scheme.
- Counter-Terrorism and Security Act 2015 (section 26 – Prevent Duty)
<https://www.legislation.gov.uk/ukpga/2015/6/contents>
Requires FE institutions to have due regard to preventing people from being drawn into terrorism.
- Prevent Duty Guidance (England and Wales, updated 2023)
<https://www.gov.uk/government/publications/prevent-duty-guidance>
Non-statutory guidance explaining compliance with the Prevent Duty.
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
Creates offences of FGM and introduces the mandatory reporting duty for regulated professionals.
- Sexual Offences Act 2003 (amended by Police, Crime, Sentencing and Courts Act 2022)
Defines sexual offences and extends "abuse of trust" provisions to additional settings.
- Equality Act 2010
<https://www.gov.uk/guidance/equality-act-2010-guidance>
Prohibits discrimination and promotes equality of opportunity.
- Health and Safety at Work etc. Act 1974
<https://www.hse.gov.uk/legislation/hswa.htm>
Requires employers to ensure the health, safety and welfare of employees and learners

- Human Rights Act 1998
Protects fundamental rights and freedoms, including the right to life, privacy and education.
- Data Protection Act 2018 and UK GDPR and Data (Use and Access) Act 2025
Governs lawful processing and information sharing of safeguarding data.
- Guidance for Safer Working Practice for those working in education settings (2022)
Non-statutory professional guidance on maintaining appropriate boundaries and minimising allegations.

Internal Reporting Process

Swarthmore has an 'If in Doubt, Shout' policy in place. You can report concerns using the QR code on the posters available throughout the Centre.

If you do not have access to the online form complete the Cause for Concern form and pass this to the DSL, Chris Baillie. If the DSL is unavailable, please pass the concern to the Deputy Designated Safeguarding Lead, Malgorzata Ciesluk. If neither are available, please pass the concern to another member of the management team.

Staff must not deal with any concerns themselves. All reports must be recorded and responded to in keeping with the policies and procedures and responsibilities within the organisation.

Students will be made aware of the reporting process at induction, and the member of staff will follow the process above.