

Safeguarding, Child Protection and Vulnerable Adults and Prevent Policy

2026-27

Ready for Inclusion

Designated Senior Lead:	Nicola Ellis, Vice Principal Inclusion and Support
Link Governor Safeguarding:	Vice Chair of Corporation
Responsible Officer:	DDSL & Director of Student Services
Date Reviewed:	August 2026
Next Review Date:	August 2027
Policy Available:	Staff Intranet, Student Space, Website
Authorised by:	Executive (subject to CQS Committee and Corporation approval)

Key Policy Updates 2026-27

This policy has been substantially updated to strengthen safeguarding arrangements, improve accessibility, align with Universal Design for Learning (UDL) principles and reflect current statutory safeguarding expectations.

1. Legislative and Statutory Compliance

- Updated throughout to reflect **Keeping Children Safe in Education (KCSIE) 2026** requirements.
- Strengthened references to contextual safeguarding, child-on-child abuse, online safety, exploitation, attendance concerns and extra-familial harm.
- Enhanced focus on safeguarding responsibilities across all College functions.
- Added references to the **Mental Capacity Act 2005**, **Care Act 2014**, **Modern Slavery Act 2015** and the **National Referral Mechanism (NRM)** to strengthen safeguards for vulnerable adults and victims of exploitation. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27

2. Universal Design for Learning (UDL) and Inclusive Safeguarding

- Introduction of a dedicated section on **UDL and Inclusive Safeguarding**.
- Strengthened accessibility of safeguarding information, reporting routes and support mechanisms.
- Greater emphasis on supporting learners with SEND, EHCPs, disabilities, communication differences and mental health needs.
- Added a comprehensive safeguarding risk assessment covering all **nine protected characteristics** under the Equality Act 2010:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
- Strengthened evidence of the College's commitment to equality, inclusion and due regard obligations under the Equality Act 2010. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27 DRAFT

3. Online Safety and Emerging Risks

- Expanded guidance regarding online abuse, exploitation, artificial intelligence (AI), deepfakes, digital manipulation, cyber-bullying, online radicalisation and social media harms.
- Reaffirmed that online safeguarding concerns are treated with the same seriousness as concerns occurring offline.

- Enhanced guidance on emerging extremist risks, harmful online communities and digital exploitation. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27

4. Governance, Accountability and Professional Practice

- Clarified responsibilities of the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL), Executive Director of People and Purpose, Governors and Senior Leaders. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27
- Added a clear **escalation and professional challenge process** where there is disagreement with decisions made by partner agencies.
- Introduced a commitment to **reflective supervision and wellbeing support** for DSLs, DDSLs and Safeguarding & Prevent staff.
- Added a cross-reference to the **Whistleblowing Policy** and confirmation that **IT filtering and monitoring arrangements** are reviewed annually.
- Removed duplicate content and streamlined accountability arrangements.

5. Criminal Convictions Disclosure Procedures

- Added a new section detailing procedures for the disclosure of **spent and unspent criminal convictions**.
- Clarifies the legal framework including:
 - Rehabilitation of Offenders Act 1974
 - Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Establishes arrangements for:
 - Risk assessment following disclosures
 - Individual representations
 - Disputing DBS information
 - Decision-making processes
 - Secure information handling, storage and retention
- Provides clear staff guidance regarding disclosure expectations in line with KCSIE requirements.
- Addresses a previous gap where DBS checks were referenced through safer recruitment processes, but disclosure management procedures were not explicitly detailed. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27 DRAFT

6. Equality, Inclusion and Accessibility

- Updated Equality Impact Assessment to better reflect safeguarding vulnerabilities associated with protected characteristics.
- Strengthened inclusive safeguarding arrangements for all learners.
- Replaced repetitive statements with evidence-informed safeguarding considerations.
- Enhanced recognition of the additional vulnerabilities experienced by learners with SEND, care experience, mental health needs and other protected characteristics. Safeguarding-Child-Protection-and-Vulnerable-Adults-and-Prevent-Policy-2026-27 DRAFT+ 1

7. New Appendices and Practical Guidance

The following appendices have been added to improve accessibility, compliance and staff confidence:

Appendix 5 – Criminal Convictions Disclosure Procedure

- Full guidance on disclosure requirements, assessment processes and decision-making arrangements.

Appendix 6 – Low-Level Concerns Procedure

- Introduces a lower-threshold reporting route for concerns about staff behaviour that may not meet the criteria for a formal allegation.
- Strengthens the College's safeguarding culture and aligns with KCSIE expectations.

Appendix 7 – Reporting a Safeguarding Concern

- Simple step-by-step guidance for staff and volunteers on reporting safeguarding concerns.

Appendix 8 – Safeguarding Contacts Directory

- Single-page reference guide containing key safeguarding contacts, including:
 - DSL
 - DDSL
 - Safeguarding and Prevent Team
 - LADO (Local Authority Designated Officer)
 - MASH (Multi Agency Safeguarding Hub)
 - Prevent Team
 - Police
- To be updated with current names and contact information prior to publication

1. Introduction

Buckinghamshire College Group is fully committed to safeguarding and promoting the welfare of all students, apprentices, staff, volunteers and visitors. This commitment is underpinned by both statutory responsibilities and a shared moral duty to provide a safe, inclusive and supportive learning environment where all members of the College community can thrive.

In line with lessons learned from national safeguarding reviews and serious case investigations, the College operates under the principle that safeguarding concerns can arise in any educational setting. We therefore maintain a culture of professional curiosity, vigilance and timely intervention, working on the assumption that safeguarding issues may be present and require appropriate action. [

Safeguarding is everyone's responsibility. Effective safeguarding requires all College staff, governors, contractors, volunteers, employers and partners to work collaboratively to identify concerns, reduce risk and respond appropriately to protect children, young people and vulnerable adults.

The College recognises that safeguarding extends beyond child protection and includes:

- Child-on-child abuse
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Domestic abuse
- Mental health and emotional wellbeing
- Serious violence
- Online safety
- Radicalisation and extremism
- Sexual harassment and sexual violence
- Attendance concerns and children missing education
- Contextual safeguarding
- County Lines
- Discrimination and hate crime
- Vulnerable adult protection
- Prevent Duty responsibilities

The College operates a Safeguarding and Prevent Committee which provides strategic oversight of safeguarding practice, compliance, risk management and quality assurance

2. Universal Design for Learning (UDL) and Inclusive Safeguarding

Buckinghamshire College Group recognises that safeguarding arrangements must be accessible to all learners irrespective of their communication style, disability, educational need, culture, language, identity or background.

The College adopts the principles of Universal Design for Learning (UDL) to ensure safeguarding information, support services and reporting mechanisms are accessible, inclusive and responsive to the diverse needs of learners. The College will:

Multiple Means of Representation

- Provide safeguarding information through written, visual, verbal and digital formats.
- Ensure safeguarding guidance is available in accessible and alternative formats where required.
- Make reasonable adjustments for learners with SEND, disabilities, learning difficulties or communication barriers.

Multiple Means of Engagement

- Embed safeguarding education within induction, tutorials, enrichment activities and learner communications.
- Encourage learner voice activities that enable students to influence safeguarding practice.
- Create safe and supportive environments that promote wellbeing and belonging.

Multiple Means of Action and Expression

- Provide multiple routes for reporting concerns, including:
 - Face-to-face disclosure;
 - Online safeguarding referrals;
 - CPOMS referrals;
 - Telephone reporting;
 - Assisted disclosures through trusted adults.

The College recognises that learners with SEND and additional vulnerabilities are statistically more likely to experience abuse, exploitation, bullying and social isolation and may face barriers to reporting concerns. All safeguarding arrangements will therefore be designed to remove barriers and promote equitable access to support.

Protected Characteristics: Safeguarding Risk Assessment

Buckinghamshire College Group has considered how each protected characteristic under the Equality Act 2010 may intersect with safeguarding vulnerability, in order to ensure equitable access to protection and support. This assessment is reviewed annually alongside the Equality Impact Assessment and informed by student voice activity, incident data and staff feedback.

Age: Younger learners (14–16, 16–17) and those aged 18–25 with EHCPs have differing legal protections and levels of independence; risk of exploitation can vary by age.

Disability: Disabled and SEND learners are statistically more likely to experience abuse, bullying and exploitation, and may face communication barriers to disclosure; UDL-based accessible reporting routes and reasonable adjustments apply.

Gender reassignment: Trans and gender-diverse learners may experience targeted harassment, exclusion or online abuse, and may be reluctant to disclose; staff receive training on inclusive, non-judgemental response and confidentiality safeguards.

Marriage and civil partnership: Risk of forced marriage and coercive control within an existing partnership for learners aged 16+; staff remain alert to indicators of forced marriage (Appendix 1).

Pregnancy and maternity: Risk of coercion, domestic abuse, or pressure regarding continuation of study; a named support contact and flexible arrangements are available.

Race: Risk of race-based hate crime, discriminatory abuse, and honour-based abuse within some communities; staff receive training on honour-based abuse indicators.

Religion or belief: Risk of faith-based discrimination, hate crime, and exposure to extremist narratives framed in religious terms; chaplaincy/faith support is available.

Sex: Gender-based violence, sexual harassment and sexual violence between students remain a recognised risk, addressed through the Sexual Violence and Sexual Harassment guidance and risk assessment process.

Sexual orientation: LGBTQ+ learners may experience bullying, harassment or family rejection, and may be at higher risk of mental health difficulty or homelessness; inclusive reporting routes and a homelessness referral pathway are available (Appendix 1).

3. Disclosures Section

Professional Boundaries and Physical Contact

Buckinghamshire College Group is committed to creating a safe, respectful and inclusive learning environment where all students, including those with SEND, disabilities, communication differences and additional vulnerabilities, can access support in ways that preserve their dignity, autonomy and personal boundaries.

In line with the College's safeguarding responsibilities and Universal Design for Learning (UDL) principles, staff should use a range of communication, de-escalation and support strategies that do not rely on physical contact.

The College operates a no-contact approach between staff and students. Staff must not initiate or engage in physical contact with students, including physical reassurance, comforting gestures, congratulatory contact or any other form of non-essential touch.

Support should be provided through:

- Verbal reassurance and active listening;
- Clear and accessible communication;
- Trauma-informed approaches;
- Reasonable adjustments;
- Visual, digital and alternative communication methods;
- Referral to appropriate support services.

Physical contact should only occur in exceptional emergency situations where there is an immediate threat to life or a serious risk of harm that cannot be managed by any other means. Any such incident must be reported immediately to the Designated Safeguarding Lead and recorded in accordance with College safeguarding procedures.

The College recognises that maintaining clear professional boundaries protects students, staff and the wider College community, and supports a culture of safety, respect and trust for all.

4. Online Safety Section

Online Safety and Emerging Technologies

The College recognises the rapidly evolving nature of digital safeguarding risks.

Staff, governors and students must remain alert to:

- Online grooming;
- Sextortion;
- Online exploitation;
- Cyber-bullying;
- Radicalisation through online platforms;
- Harmful social media content;
- Artificial intelligence generated content;
- Deepfake images and videos;
- Misinformation and disinformation;
- Sharing of nude and semi-nude images;
- Online fraud and financial exploitation.

Safeguarding concerns arising online will be managed using the same safeguarding procedures applied to concerns arising in person. The College's Acceptable Use Policy and IT monitoring arrangements support the identification and management of online safeguarding risks.

The College's IT filtering and monitoring systems are reviewed at least annually by IT Services in conjunction with the Designated Safeguarding Lead/ Deputy DSL, in line with KCSIE expectations.

5. Statutory and Legislative Framework

Buckinghamshire College Group is committed to ensuring that safeguarding arrangements are accessible, inclusive and responsive to the diverse needs of all learners, staff and stakeholders. In line with the principles of Universal Design for Learning (UDL), this policy is informed by legislation and statutory guidance that promotes the safety, welfare, rights and equitable treatment of children, young people and vulnerable adults.

The College will ensure that safeguarding information, procedures, reporting mechanisms and support pathways are communicated through multiple means of representation, engagement and action, enabling all individuals to understand, access and participate in safeguarding processes.

This policy is underpinned by the following legislation and statutory guidance:

- The Children Act 1989 and 2004, which provides the legal framework for safeguarding and promoting the welfare of children and young people.
- The Education Act 2002, which places a statutory duty on governing bodies and education providers to make arrangements to safeguard and promote the welfare of learners and vulnerable adults.
- The Sexual Offences Act 2003, which establishes offences relating to abuse of a position of trust and reinforces professional boundaries between staff and learners.
- The Safeguarding Vulnerable Groups Act 2006, which supports the protection of children and vulnerable adults through safer recruitment practices and underpins the Disclosure and Barring Service (DBS).

- The Protection of Freedoms Act 2012, which defines regulated activity and eligibility for barred list checks, supporting proportionate safeguarding arrangements.
- Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children, which provide statutory guidance for education providers and set expectations for safeguarding practice, multi-agency working, online safety, child protection and learner welfare.
- The Equality Act 2010, which requires the College to eliminate discrimination, advance equality of opportunity and foster good relations. The College recognises that learners with protected characteristics may experience additional barriers and vulnerabilities and will make reasonable adjustments to ensure equitable access to safeguarding support.
- The Female Genital Mutilation Act 2003 (Section 5B), which places a mandatory reporting duty on relevant professionals to report known cases of FGM involving individuals under 18 years of age.
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, which provides guidance on preventing, identifying and responding to harmful sexual behaviours, sexual harassment and sexual violence.
- The Mental Capacity Act 2005 and the Care Act 2014, which provide the legal framework for assessing capacity and for local authority safeguarding duties towards adults at risk, relevant to the College's provision for vulnerable adults up to age 25.
- The Modern Slavery Act 2015, which consolidates offences relating to slavery, servitude and trafficking; where indicators of modern slavery or trafficking are identified, a referral will be made to the National Referral Mechanism (NRM) alongside any child protection or police referral.

In accordance with UDL principles, the College will ensure that safeguarding guidance and support are available in accessible formats and that reasonable adjustments are made where required to support learners with SEND, EHCPs, disabilities, communication differences, mental health needs, language barriers or other additional vulnerabilities.

The College also takes account of advice, guidance and best practice issued by the Department for Education, Disclosure and Barring Service, safeguarding partnerships, Prevent partners and other relevant professional bodies to continually improve inclusive safeguarding practice.

6. Procedure for dealing with 14-16 students

The overall responsibility for the safeguarding of 14-16 students remains with the Local Authority. This does not, however, negate the responsibility placed on staff to act immediately and appropriately if a disclosure is made. Local authorities must be informed immediately to ensure a collaborative and transparent approach. The first point of contact is the Director of Student Services who will liaise with the [Educating your child at home - GOV.UK](#) manager at the Local Authority and the College's Lead Designated Safeguarding Officer.

Looked after children, previously looked after children, 'care leavers', children with social workers and students with special educational needs up to the age of 25 may also need additional services, assistance, protection and consideration. They are supported through the scope of this policy by the dedicated lead for looked after children and care leavers, the learning support team and the wider student support team.

7. Allegations against staff

The primary concern of the College is to ensure the safety of its students. It is essential that in all cases of suspected abuse by a member of staff, or where there are any safeguarding concerns about a member of staff, that action is taken quickly and professionally, whatever the validity.

Any member of staff who has a concern about the conduct of a colleague which does not meet the threshold of a formal allegation, or which they feel unable to raise through normal management routes, may raise it as a low-level concern (see Appendix 6) or under the College's Whistleblowing Policy.

In cases where a safeguarding concern is raised about a member of staff, the College will follow its established safeguarding and disciplinary procedures to ensure a fair, proportionate, and legally compliant response. Where the concern involves potential risk to students or others, suspension may be considered as a precautionary measure to protect all parties and allow for a full and impartial investigation.

The LADO must be informed within 24 hours of a concern/allegation being raised. If the allegation concerns the Principal/CEO, the matter should be referred to the Designated Governor who will discuss it with the Chair of Governors, in addition to following the normal procedure for safeguarding.

The Executive Director of People and Purpose is responsible for assessing the nature and seriousness of the concern in consultation with the Designated Safeguarding Lead. If suspension is deemed appropriate, the Executive Director of People and Purpose will make a formal recommendation to one of the Senior Post Holders (SPHs), who holds the authority to enact the suspension in line with the College's Disciplinary Policy.

Suspension is not a presumption of guilt and will only be used where:

- There is a risk of harm to students, staff, or the integrity of the investigation.
- The presence of the staff member could compromise evidence or influence witnesses.
- The allegation is of a serious nature and requires immediate safeguarding action.

All decisions regarding suspension will be documented, and the staff member will be informed of the reasons, support available, and next steps. The Executive Director of People and Purpose will oversee the process to ensure it aligns with employment law, safeguarding guidance, and internal policy.

8. Allegations about employers

Employers and their staff play a key and growing role in supporting and delivering education, training and assessment. Any cases of suspected abuse by an employer or their staff must be investigated quickly and professionally, whatever the validity. The Principal/Vice Principals have the right to pause engagement with an employer whilst an investigation takes place. In the event that suspected abuse by an employer is reported to any member of the College team, the Vice Principal for Curriculum & Quality and the DSL should be informed

The LADO must be informed within 24 hours of a concern/allegation being raised. Depending on the outcome of the investigation, the Vice Principals have the authority to suspend or terminate employer contracts as well as blacklist the employer from future apprenticeships, placements or College engagement activities.

9. Designated staff with responsibility for safeguarding

The Designated Lead for safeguarding for the College is the Vice Principal for Inclusion and Support, in the absence of the Vice Principal Inclusion and Support, this role will be fulfilled by the College Deputy Safeguarding Lead which is the Director of Student Services. All members of the Student Services team

are Designated Safeguarding Officers. The team is fully trained on all aspects of safeguarding and receives refresher training every two years. Further training has been undertaken on aspects such as transgender awareness, mental health, substance and alcohol abuse, Prevent and trauma-related practice.

The Designated Safeguarding Officers are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Liaising with the Local Authority, LSCB and LADO and other appropriate agencies.
- Liaising with employers and training organisations – who host students from the College on placements or employ learners as apprentices, to ensure appropriate safeguards are put in place.
- Ensuring staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the College's safeguarding procedures.
- Liaising with secondary schools to ensure that appropriate arrangements are made for pupils who may be at risk or who are subject to a Child Protection or Child in Need plan.
- Ensuring the College is represented at case conferences and review meetings as appropriate.
- The Vice Principal for Inclusion and Student will compile a termly report for the Governing Body setting out how the College has discharged its duties (supported by contribution from the lead Governor for Safeguarding). This report will include emerging themes and any changes to legislation.

The Designated Safeguarding Leads will make sure structures and processes are in place to ensure the College holds contact details for parents, guardians and carers of all students up to the age of 18 (or 25 for students with learning difficulties and/or disabilities). It is the responsibility of the DSL to work closely with strategic leads to provide oversight of the outcomes of safeguarded students and ensure that all staff receive appropriate safeguarding, child protection (including online) and Prevent training during induction. The training should be regularly updated.

Where the Designated Safeguarding Lead or Deputy disagrees with a decision made by children's social care, adult social care or another partner agency regarding the level of risk or action to be taken, they will use the Buckinghamshire Safeguarding Partnership's escalation/professional resolution procedure to formally challenge the decision; a concern will never simply be left unresolved.

The College recognises the cumulative emotional impact of safeguarding work and will offer Designated Safeguarding Leads and Officers regular reflective supervision and access to wellbeing support, in addition to their scheduled training refresh.

The Executive Director of People and Purpose plays a key strategic role in safeguarding staff-related concerns. They are responsible for ensuring that safeguarding and Prevent duties are embedded within HR policies, procedures, and staff training. This includes overseeing safer recruitment practices, coordinating Prevent and safeguarding training for all staff, and ensuring that concerns raised about staff conduct are managed appropriately and in line with statutory guidance. The Executive Director People and Purpose also works closely with the Designated Safeguarding Leads to ensure that safeguarding responsibilities are consistently applied across the workforce and contributes to the monitoring and review of safeguarding data and action plans through the Safeguarding and Prevent Committee.

10. Prevent Policy

Buckinghamshire College Group is committed to providing students with the necessary skills and knowledge to keep themselves and others safe. Education like other key sectors has a responsibility to promote values of openness and tolerance and to facilitate free debate which is characteristic of being a British citizen. The College's approach is informed by the national strategy known as 'Contest' including the four key elements: Pursue, Prevent, Protect and Prepare.

All concerns under the Prevent Duty will be addressed by College Designated Safeguarding Leads in collaboration with the Vice Principal Inclusion and Support as senior lead. Procedures are in place to report concerns to the Prevent lead at the Local Authority and the Department for Education. Training in 'Channel' general awareness and Prevent will be undertaken by all College staff and governors. All staff are expected to undertake awareness training and will be supported by the Designated Safeguarding Officers when concerns arise under the Prevent Duty. The Executive Director for People and Purpose plays a key role in embedding Prevent and safeguarding responsibilities within HR policy, staff induction, and workforce training compliance, working closely with the Designated Safeguarding Leads.

Reporting on incidents of safeguarding including Prevent as well as reviewing the College Prevent action plan and risk assessment are monitored through the Safeguarding & Prevent Committee and presented on an annual basis to Governors.

The new KCSIE 2026 offers updated definitions of the following:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Prevent Duty is seen as part of the College's wider safeguarding obligations. Designated Safeguarding Leads and other senior leaders should familiarise themselves with the revised Prevent Duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance; Prevent duty guidance: for further education institutions in England and Wales that applies to colleges. All extremists aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

The College does not tolerate extremist views of any kind whether from internal sources; students, staff or governors, or external sources; College community, external agencies or individuals. Students see our College as a safe place, free from harm or risk of harm and where necessary we will action referrals or processes to ensure the College remains a safe place for all. As a College, we recognise that extremism and Safeguarding, Child Protection and Vulnerable Adults and Prevent Policy

exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our students. Therefore, at the College we will provide a broad and balanced tutorial programme (WISPA), delivered by skilled Progress Coaches so that our students understand and become tolerant of difference and diversity. We will ensure that they feel valued and not marginalised. By delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in accordance with our student Supportive Performance Management Policy and Procedures.

As part of wider safeguarding responsibilities, College staff will be alert to:

- Behaviours that might be a concern, and report these to a Designated Safeguarding Officer
- Racialisation in the college and local community and how to identify it.
- The importance of promoting British Values through both the curriculum and as part of the student engagement team (SET).
- Disclosures by students, of their exposure to the extremist actions, views or materials of others outside, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner colleges, Local Authority services, and Police reports of issues affecting students in other colleges or settings.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.
- Emerging groups such as INCELS or MUUR.
- The ideological causes of terrorism and how to tackle them.

The College will closely follow any locally agreed procedure as set out by the Local Authority including agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. We will actively engage with the Police, and regional DfE Further Education Prevent Co-coordinators. As a College we reserve the right to initiate our own internal policies in light of a safeguarding concern that may put the student, other students, or staff at risk of harm.

We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences. We will ensure that we follow procedure as directed by the Local Authority, Prevent Coordinator, Police, social care and any other agency necessary to safeguard and support that student and others. Additionally, in such instances our internal policies may be actioned to prevent risk of harm.

11. Designated Governor

The College will appoint a Designated member of the Governing Body with responsibility for Child Protection, Safeguarding, e-Safety and Prevent implementation. All Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals. The Designated Governor is responsible for liaising with the designated person with lead responsibility over matters regarding Child Protection, Safeguarding, e-Safety and Prevent, ensuring that:

- The Group has procedures and policies which are consistent with the LSCB procedure.
- The Governing Body considers the Group policy on Child Protection, Safeguarding, e-Safety and Prevent on an annual basis.
- Each year the Governing Body is informed of how the College and its staff have complied with the policy including, but not limited to, a report on the training staff have undertaken.
- The Designated Governor is responsible for overseeing the liaison between agencies, such as the Police and Social Services, in connection with allegations against the CEO. This will not involve undertaking any form of investigation but will ensure good communication between parties and provide information to assist enquiries.
- To assist in these duties, the Designated Governor shall receive appropriate training and is invited to attend Safeguarding and Prevent Committee meetings.

12. Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned. The young person or vulnerable adult should be informed at the earliest possible stage of the disclosure the information will be passed on. The College complies with DPA/UKGDPR requirements, which allows for disclosure of personal data where this is necessary to protect the vital interests of a student or adult at risk.

13. Safer Recruitment

Safer recruitment is part of the College's Recruitment and Selection Policy. At least two panel members involved in interviews are Safer Recruitment trained, meaning they have completed accredited training to ensure safeguarding is embedded throughout the recruitment process. This includes identifying and deterring unsuitable candidates, conducting appropriate pre-employment checks (such as DBS), and following legal and ethical procedures. The College also has a Disclosure and Barring Service Policy and a procedure for dealing with allegations of abuse against members of staff, all of which relate to safeguarding and are located on the intranet. KCSIE 2026 highlights that educational settings should consider online searches as part of their due diligence checks on shortlisted candidates.

The Human Resources department will maintain a single central register of all checks carried out on staff and volunteers who work with anyone within the scope of this policy. KCSIE 2026 clarifies that a CV should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment. The single central register will be monitored by the Executive Director for People and Purpose and the Designated Safeguarding Lead.

14. Criminal Convictions Disclosure (Spent and Unspent)

Buckinghamshire College Group recognises its duty to safeguard students and vulnerable adults while treating staff, job applicants and learners fairly and lawfully in respect of criminal record information. This section applies to disclosures made by prospective and current staff, volunteers, contractors and students. An additional annex is outlined in this policy regarding the procedure to be followed upon student criminal conviction disclosure/s.

Legal Framework: The Rehabilitation of Offenders Act 1974 generally allows convictions to become spent after a rehabilitation period, after which a person is not obliged to disclose them for most purposes. However, the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 disappplies this protection for posts involving regulated activity with children or vulnerable adults; roles falling within this Order require disclosure of both spent and unspent convictions, cautions, reprimands and warnings. The Police Act 1997 and Safeguarding Vulnerable Groups Act 2006 provide the statutory basis for standard and enhanced DBS checks and barred list checks, and the DBS Code of Practice governs how disclosure information must be handled, stored and used.

- i. All posts in regulated activity are clearly identified at the recruitment stage, with candidates informed in writing that both spent and unspent convictions must be disclosed.
- ii. Disclosures made on application forms, at interview, or arising from a DBS certificate are treated in strict confidence and shared only with those who need to know (normally the Executive Director of People and Purpose and the Designated Safeguarding Lead).
- iii. Where a DBS certificate discloses information, a risk assessment meeting is held before any recruitment or continued-employment decision is made, considering the nature and relevance of the offence(s) to the role, the age of the offence, evidence of rehabilitation, and the level of contact the role involves with children or vulnerable adults.
- iv. The individual is given the opportunity to make representations regarding the disclosure before any decision is finalised, and is informed of the outcome and reasons in writing.
- v. Where an individual believes information on a DBS certificate is inaccurate, they may apply directly to the DBS to dispute it; the College will not make a final decision until any dispute process has concluded, unless there is an immediate and serious safeguarding risk requiring interim precautionary action.
- vi. Disclosure information is stored securely, separately from the wider personnel file, accessible only to those named above, and is retained and destroyed in line with the DBS Code of Practice and the College's Data Protection and Retention Policy.
- vii. Where a student or apprentice discloses a criminal conviction, the same principles of proportionality, confidentiality and right of representation apply, coordinated between the Director of Student Services, the placement/employer liaison lead and, where the student is under 18 or has an EHCP, parents/carers or the Local Authority as appropriate.
- viii. A refusal to disclose a conviction that was legally required to be disclosed may itself be treated as a safeguarding and conduct matter.

15. Communication

Safeguarding information will be made available through accessible channels and formats in line with the UDL framework, including written, visual, verbal and digital routes, with reasonable adjustments where required.

The policy is displayed on the College website, staff intranet and the Virtual Learning Environment (VLE) for students.

Equality Impact Statement / Inclusive Safeguarding Statement

Section One	
College:	Buckinghamshire College Group
Departments Effected:	Whole College
Who is responsible for the Equality Impact Assessment?	Nicky Ellis
Title (of the policy/practice/decision)	Vice Principal Inclusion and Support
Description (Provide a brief description of the policy/practice/decision)	Buckinghamshire College Group is committed to protecting all our students and staff. The fundamental principles of this policy are based on legislation and also a moral duty to safeguard the welfare of students and staff at the College.

Section Two – Stakeholder Consultation		
2	Who are the main stakeholders and what consultation exercise are you planning to undertake, if required (e.g. consultation with Employee Voice, Trades Unions, Staff groups, Student groups?)	Executive
3	Are there concerns that this could result in differential or adverse impact on any Equality Groups (Protected Characteristics as identified by the Equality Act 2010)	No

Section Three

Please identify how the policy may impact the following protected characteristics:

- Identify any positive impacts the policy/practice/decision may have on equality groups.
- Identify any negative impacts the policy/practice/decision may have on equality groups.
- Propose measures to mitigate or eliminate identified negative impacts.

Protected Characteristics	Impact High/Medium/ Low/N/A	Action(s) you will take to mitigate or remove the negative or adverse impact if identified? Propose measures to mitigate or eliminate identified negative impacts
1. Age (e.g. are there ways older or younger people may find it difficult to engage?)	Low	This policy is applicable to all
2. Disability (eg do you need to consider large print or easy read?)	Low	This policy is applicable to all
3. Gender identification (eg is your language inclusive of LGBTQ+ groups?)	Low	This policy is applicable to all
4. Gender Re-assignment (eg is your language inclusive of trans and non-binary people?)	Low	This policy is applicable to all
5. Marriage & Civil Partnerships (eg does it treat marriage and civil partnerships equally?)	Medium	Consideration is given to race and ethnicity where additional safeguarding concerns may apply, eg, FGM, forced marriage, honour-based abuse
6. Pregnancy & Maternity (eg with this have an impact on pregnant or those on family leave; breastfeeding services?)	Low	This policy is applicable to all

7. Race / Ethnicity <i>(eg does it take into account the needs of people from different groups)</i>	Medium	Consideration is given to race and ethnicity where additional safeguarding concerns may apply, eg, FGM, forced marriage, honour based abuse
8. Religion or Belief <i>(eg do people from faith groups experience any specific disadvantage)</i>	Medium	Consideration is given to race and ethnicity where additional safeguarding concerns may apply, eg, FGM, forced marriage, honour based abuse
9. Sexual Orientation <i>(eg is your language inclusive of LGBTQ+ groups?)</i>	Low	This policy is applicable to all

Section Four – Monitoring and Review	
Does your criteria and procedure promote fairness and equal opportunities? <i>Utilise relevant data sources, such as demographic information, student feedback, or staff surveys, to inform the analysis as necessary</i>	Yes, we adhere to the KCSIE 2026 statutory guidance. Regular training is delivered to all students and staff. Safeguarding is regularly reviewed by the governing body.
How will you monitor and evaluate the effectiveness of these measures to determine whether it has been effectively and fairly applied	We monitor through deep dives of records Safeguarding training is planned and monitored Executive Director for HR works closely with DSL Adhere to the KCSIE 2026 statutory guidance.

Section Five – Outcome, Sign-off and Authorisation	
Equality Impact Assessment Outcome Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision	
Option 1: No change required – the assessment is that the policy/practice is/will be robust.	X
Option 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.	
Option 3: Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified	
Option 4: Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.	
Name & job title of authorised person	Nicola Ellis, Vice Principal Inclusion and Support
Equality Impact Assessment was completed on:	June 2026
Date of next review, and by whom? This may include regular reviews, data analysis, and stakeholder feedback	June 2027 Vice Principal Inclusion and Support

Appendices

APPENDIX 1 - Definitions of Abuse

In respect of the policy the College recognises the following as definitions of abuse:

- **Bullying:** Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power.
- **Physical abuse:** Physical abuse causes harm. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. Physical abuse can also be when a parent, guardian or carer fabricates symptoms or induces illness in a student.
- **Neglect:** Neglect is the persistent or severe failure to meet a student's or adult at risk's basic physical and/or psychological needs. It will result in serious impairment of the student's and/or adults at risk's health or development.
- **Sexual abuse:** Sexual abuse involves a student or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the student or adult at risk to be aware that the activity is sexual and the apparent consent of the student or adult at risk is irrelevant. It also relates to sexual abuse in terms of e-safety and child sexual exploitation, such as inappropriate images, film and evidence of grooming.
- **Exploitation** is the deliberate manipulation or abuse of power used to have control over another person, usually for some form of gain. This can be for a range of reasons including personal, financial or sexual. This can occur outside the home environment, including online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity. This is a significant distinction where previously they may have been viewed as an offender instead of a victim.
- **Non-contact abuse:** Non-contact abuse is when abusive acts do not involve actual physical contact, i.e., pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.
- **Emotional abuse:** Emotional abuse occurs when there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the student or adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.
- **Financial abuse:** Financial abuse is the misuse of a person's funds and assets; obtaining property and funds without his/her knowledge and full consent, or in the case of an elderly person who is not competent, not in his/her best interests. This is also known as material abuse. Financial or material abuse can involve the theft or misuse of a person's money or property.
- **Radicalisation and extremism:** Radicalisation refer to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity. Extremism is defined 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.
- **Terrorism:** Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for advancing a political, religious or ideological cause. Channel is a voluntary confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism

- **Discriminatory abuse:** Discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include:
 - Disability - physical or learning disability, mental, ill-health or sensory impairment
 - Race
 - Gender
 - Age
 - Religion
 - Cultural background
 - Sexual orientation
 - Political convictions
 - Appearance
- **Child Sexual Exploitation (CSE) and Child Crime Exploitation (CCE):** Both Child Sexual Exploitation and Child Crime Exploitation are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Individuals or groups, male or females, children or adults can carry out this abuse. It can be a one-off occurrence or over a long period. County Lines – Criminal exploitation is a geographically widespread form of harm, that is a typical feature of County Lines criminal activity; drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas.
- **Grooming:** Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know – for example a family member, friend or professional.
- **Cyber-bullying:** Cyber-bullying is bullying that takes place over digital devices like mobile phones, computers, and tablets. Cyberbullying can occur through SMS, text and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.
- **Forced Marriage:** Forced marriage is where one or both people do not consent to the marriage and pressure or abuse is used. Pressure can include threats, physical or sexual violence, and financial pressure. All child marriages are forced, because a child cannot provide informed consent, and is therefore a violation of children's rights.
- **Female Genital Mutilation (FGM):** Female Genital Mutilation (FGM) is a human rights violation, torture and an extreme form of violence and discrimination against girls and women. It is most often carried out on girls between infancy and age 15, though adult women are occasionally subjected.
- **Significant Harm:** Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- **Child on Child Sexual Violence and Sexual Harassment:** Further guidance has been published in the sexual violence and sexual harassment between children in schools and colleges (May 2018). The referral process is as per any safeguarding concern, but the College must act swiftly and ensure a risk assessment is carried out. The risk assessment must consider:
 - The victim
 - The alleged perpetrator
 - All other children and, if appropriate, other adults, children and staff.

- **Children Missing in Education:** Children missing in education is often an indicator for other potential safeguarding concerns. The Group should have measures, through its attendance reporting and follow up procedures, to ensure it is following up on students, who could potentially be “missing in education”.
- **Domestic Abuse:** Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender of sexuality. The Police are committed to tackling crime and disorder and supporting public protection across Buckinghamshire and work on a regular basis with education establishments. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. Domestic abuse can impact on a child who sees or hears, or experiences the effects of the abuse and it treats such children as victims of domestic abuse in their own right where they are related to or under parental responsibility of either the abuser or the abused.
- **Child on Child Abuse:** This can include, but is not limited to bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals between students; sexual violence such as rape, assault by penetration and sexual assault; sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse. The Department of Education has published advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads in the document: Sexual violence and sexual harassment between children in schools and colleges. (September 2021).
- **Upskirting:** The Voyeurism (offences) Act, which is commonly known as the Upskirting Act, came into force on the 12th April 2019. Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a student’s welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- **Fabricated or Induced Illness:** (FII) is a form of abuse associated with a range of poor outcomes for children and young people extending to the serious harm or even death of the child. Behaviours by a parent or carer may result in harm to a child or young person. FII can occur when a child or young person also has a confirmed diagnosis of illness or disability and the two may coexist, but the health seeking behaviour or presentation is outside that expected for the condition or disability.
- **Honour based abuse:** This can be a form of abuse that may be linked to certain practices that are related to culture, faith, beliefs, and that may put young people at the risk of abuse.
- **Serious Violence:** There are indicators, which may signal that a child is at risk from, or involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measure in place to manage these. Advice is provided in the Home Office’s Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance.

- **What are Incels:** Incels are self-defined 'involuntary celibates' who believe that they are unable to form sexual relationships with women due to a combination of their looks and their perception of societal structures. Some Incels express intense hatred for women, believing that they are entitled to sexual and romantic attention, and perceive women as denying them this need. Some followers of this online subculture also target attractive or sexually active men as well as women. The Incel subculture mainly operates online, and can be seen as more of a subculture than a coherent group or organisation. Incels sometimes use highly specialised language developed by themselves, and use it to communicate in online forums and share their worldview.
- **Categories of Incel:** Members of Incel subculture(s) regularly use jargon and have developed a distinct dialect. Incels often use dehumanising terms for women, such as "femoids", and use stereotypes and generalisations to define both those inside and outside of the Incel subculture(s). The categorisation of different Incel 'types' has become more common and is continually updated and added to.

Here are some examples of common categories Incels use:

Incel subgroup	Definition
Truecel	an Incel that has had no physical intimacy at all
Volcel	someone that is considered to be 'voluntarily celibate'
Mentalcel	someone who is celibate due to a mental health condition or being on the Autistic Spectrum Condition (ASC), but may also refer to low intelligence
Heightcel	someone who is believes they are celibate because they are short

Possible signs of extremism:

- Being influenced or controlled by a group
- An obsessive or angry desire for change or something to be done
- Spending and increasing amount of time online and sharing extreme views on social media
- Personal crisis
- Need for identity, meaning or belonging
- Mental health issues
- Looking to blame others
- Desire for status need to dominate

<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version>

Appendix 2 - Keeping Children Safe in Education (KCSiE) – Translations

It is the responsibility of everyone to keep children safe and to read Part One of the statutory guidance

"Keeping Children Safe in Education". The London Grid for Learning (LGfL) have had KCSiE part one translated into a number of languages; Arabic, Bengali, Cantonese, Gujarati, Mandarin, Polish, Portuguese, Punjabi, Spanish and Urdu.

The translations can be downloaded here: <https://national.lgfl.net/digisafe/kcsie/kcsietranslate>

Vulnerable Adult – someone who is over 18 who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or may be unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.

Information on recognising abuse What is Neglect?

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse.

A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

Signs of abuse Poor appearance and hygiene:

- Being smelly or dirty
- Being hungry or not given money for food
- Having unwashed clothes, having the wrong clothing, such as no warm clothes in winter
- Health and development problems; e.g. anaemia
- Body issues, such as poor muscle tone or prominent joints
- Medical or dental issues
- Missed medical appointments, such as for vaccinations
- Not given the correct medicines
- Poor language or social skills
- Regular illness or infections or repeated accidental injuries, often caused by lack of supervision.
- Skin issues, such as sores, rashes, flea bites, scabies or ringworm
- Thin or swollen tummy
- Tiredness
- Untreated injuries
- Weight or growth issues.
- Housing and family issues; living in an unsuitable home environment, such as having no heating
- Being left alone for a long time
- Taking on the role of carer for other family members.

Changes in behaviour such as:

- Becoming aggressive
- Being withdrawn, depressed or anxious
- Changes in eating habits
- Displaying obsessive behaviour
- Finding it hard to concentrate or take part in activities
- Poor attendance
- Showing signs of self-harm
- Using drugs or alcohol

What is physical abuse?

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes; hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching. It is important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell. Signs of abuse; bumps and bruises do not always mean a child is being physically abused. All children have accidents, trips and falls. And there is not just one sign or symptom to

Safeguarding, Child Protection and Vulnerable Adults and Prevent Policy

look out for. But it is important to be aware of the signs. If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation does not match the injuries, then this should be reported.

Symptoms include:

- Bruises
- Broken or fractured bones
- Burns or scalds
- Bite marks

It can also include other injuries and health problems, such as:

- Scarring
- The effects of poisoning, such as vomiting, drowsiness or seizures
- Breathing problems from drowning, suffocation or poisoning.

What is sexual abuse?

When a child or young person is sexually abused, they are forced or tricked into sexual activities. They might not understand that what is happening is abuse or that it is wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere – and it can happen in person or online. It is never a child's fault they were sexually abused – it is important to make sure children know this. Types of sexual abuse. There are 2 types of sexual abuse – contact and non-contact abuse. And sexual abuse can happen in person or online. Contact abuse is where an abuser makes physical contact with a child.

This includes:

- Sexual touching of any part of a child's body, whether they are clothed or not.
- Using a body part or object to rape or penetrate a child.
- Forcing a child to take part in sexual activities.
- Making a child undress or touch someone else.

Contact abuse can include touching, kissing and oral sex – sexual abuse is not just penetrative. Noncontact abuse is where a child is abused without being touched by the abuser.

This can be in person or online and includes:

- Exposing or flashing.
- Showing pornography.
- Exposing a child to sexual acts.
- Making them masturbate.
- Forcing a child to make, view or share child abuse images or videos.
- Making, viewing or distributing child abuse images or videos.
- Forcing a child to take part in sexual activities or conversations online or through a smartphone.

Emotional and behavioural signs:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.

- Self-harm.
- Changes in eating habits or developing an eating problem.
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary.

Physical signs:

- Bruises.
- Bleeding, discharge, pains or soreness in their genital or anal area.
- Sexually transmitted infections.
- Pregnancy.

What is emotional abuse?

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child or young person. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or young person. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Types of emotional abuse include:

- Humiliating or constantly criticising the child.
- Threatening behaviour including shouting.
- Using sarcasm or making the child the subject of jokes.
- Blaming the child for situations.
- Making a child perform degrading acts.
- Pushing a child or trying to control their lives.
- Exposing a child to events or situations such as domestic abuse or drug taking.
- Not allowing a child to have friends.
- Failing to promote a child's social development.
- Making a child perform degrading acts.
- Persistently ignoring a child.
- Being absent.
- Manipulating a child.
- Being constantly negative about the child.
- Never showing any emotion to a child.

Signs of emotional abuse

With emotional abuse there may not be any obvious physical signs and a child may not tell anyone what is happening until they reach a crisis point. It is therefore important you look at how the child is acting and behaving.

Signs may include:

- Unconfident or lacking in self-assurance.
- Struggling to control their emotions.
- Having difficulty in maintaining relationships.
- Acting in a way that is inappropriate for their age.
- Use of inappropriate language.
- Being isolated from their parents.
- Lacking social skills.

- Have few or no friends.

Unexplainable and or persistent absences from education

Staff receive training on awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. (Part one – Paragraph 29 KCSIE 24).

This should not be confused with Emotional based School Non-attendance (EBSNA).

<https://familyinfo.buckinghamshire.gov.uk/education-and-learning/improving-your-childs-school-attendance/emotionally-based-school-avoidance-ebsna/>

GLOSSARY OF TERMS

Safeguarding is a term, which is broader than “child protection” and relates to the action taken to promote the welfare of children and young people and protect them from harm. Safeguarding is everyone’s responsibility.

Children and Young People – throughout the document, references are made to “children and young people”. These terms are interchangeable and refer to children to have not yet reached 18 or vulnerable adults up to the age of 25.

Staff – includes any adult who is employed, commissioned or contracted to work with children or young people, including volunteers and guest speakers in either a paid or an unpaid capacity.

Designated Safeguarding Lead DSL – a senior member of staff with overall responsibility for children protection within the Group.

Duty of Care – the duty which rests upon an individual or organisation to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible.

External Agencies – including Children’s Services, Independent Safeguarding Authority, Buckinghamshire Safeguarding Board, Police, etc.

External Contractors – including building or maintenance contractors who are required to work at the Group for a given period.

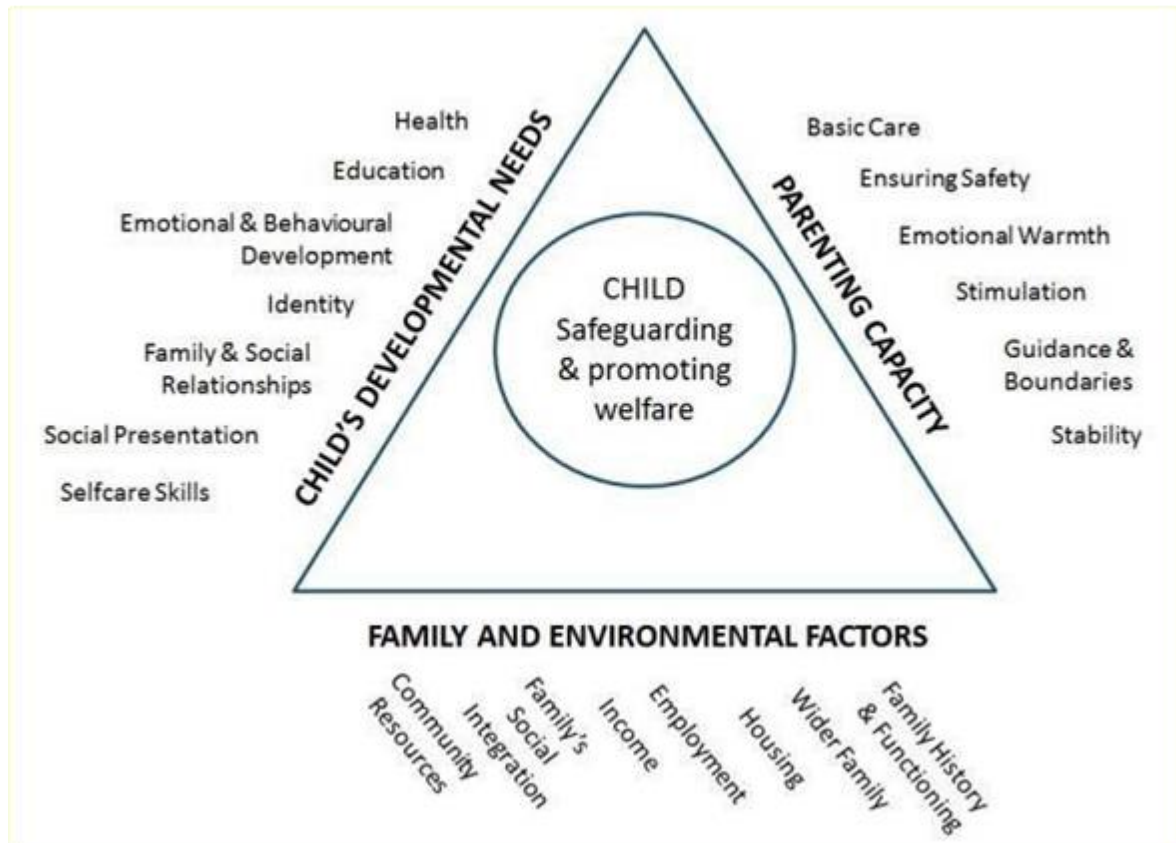
Deputy Designated Safeguarding Lead DDSL the person who is responsible in the absence of the DSL.

Local Authority Designated Officer LADO is responsible for overseeing concerns, allegations, or incidents involving individuals working with children and young people.

APPENDIX 3

Assessment Framework

Taken from *Working Together to Safeguard Children, 2023 (WT2023)*



Every assessment should draw together relevant information gathered from the child and their family and from relevant practitioners including teachers and College staff, early years workers, health practitioners, the Police and adult social care.

Every assessment of a child should reflect the unique characteristics of the child within their family and community context.

Each child whose referral has been accepted by children's social care should have their individual needs assessed, including an analysis of the parental capacity to meet those needs, whether they arise from issues within the family or the wider community.

Frequently, more than one child from the same family is referred and siblings within the family should always be considered.

APPENDIX 4 – Nursery - Safeguarding Children and Young People Policy

This appendix should be read in conjunction with Buckinghamshire College Group safeguarding policy and guidelines.

Purpose: This policy deals with the protection of all children at Aylesbury College Day Nursery.

Scope: Children and young people are defined as those under the age of 18 years. Therefore, will include students on work placements in the nursery.

Statement of Policy:

- Aylesbury College Day Nursery holds as one of its highest priorities the health, safety and welfare of all children and young people involved in courses or activities, which come under the responsibility of the nursery.
- Aylesbury College Day Nursery will have a child protection policy and procedures in place, which are made available to parents, students and staff, this will include a policy on the use of mobile telephones, cameras and smart watches.
- Aylesbury College Day Nursery will operate safe recruitment procedures and make sure appropriate checks are carried out on staff and volunteers who work with children and young people. Please refer to recruitment policy.
- All Nursery staff will take responsibility to ensure that all children and staff interact well with one another and feel safe and comfortable within the nursery.
- Aylesbury College Day Nursery expect all staff to lead by example and to play a full part in promoting an awareness that is age appropriate for all our children on issues relating to health, safety and well-being.
- Aylesbury College Day Nursery will establish and maintain an environment where children feel safe.
- Aylesbury College Day Nursery will ensure children know that there are adults in the nursery whom they can speak to if they are worried or upset about anything.
- Aylesbury College Day Nursery will include opportunities in the daily routine for children to develop the skills they need to recognise how to keep themselves safe.
- Aylesbury College Day Nursery will promote awareness by teaching children how to keep themselves safe, help children to adjust their behaviours in order to reduce risks and build confidence.
- Aylesbury College Day Nursery Staff acknowledge the need for a culture of vigilance to be present in the nursery to support safeguarding.
- Aylesbury College Day Nursery staff will be mindful / respectful and take into consideration cultural differences.
- Aylesbury College Day Nursery will have procedures in place for dealing with allegations of abuse against members of staff and volunteers. In all instances of an allegation made against a member of staff, it should be reported to the LADO, as per College Safeguarding and Prevent Policy.
- Allegations made against children by other children will be dealt with as part of our behaviour management policy section strategies to promote positive behaviour (see behaviour management policy)
- Aylesbury College Day Nursery will provide a senior member of staff designated to take lead responsibility for dealing with child protection issues, providing advice and support to staff, and liaising with agencies. Carol Carlin, Head of Early Years Nursery / PreSchool, is the lead member of staff for these purposes.

- Aylesbury College Day Nursery will provide regular mandatory training to ensure all staff are aware of the arrangements for child protection and Prevent and their responsibilities for both.
- Aylesbury College Day Nursery will undertake an annual review of its policies and procedures relating to safeguarding children and young people.
- Aylesbury College Day Nursery is fully aware of its legal responsibilities.

The Child Protection Manager and Prevent Lead for children in Aylesbury College Day Nursery is: Carol Carlin
Head of Early Years Nursery / Pre-school – 01296 588594 ccarlin@buckscollegigroup.ac.uk

Individuals may also contact the first response team at Buckinghamshire County Council on the following number, with any concerns they have.

Telephone 01296 383962: Out of hours number 08009997677

Website: buckssafeguarding.org.uk/childpartnership/

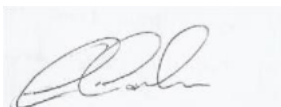
Email: secure-cypfirstresponse2@buckinghamshire.gov.uk

Reviewed June 2026

Next review date June 2027

Name: Carol Carlin

Signature:



APPENDIX 5: Guidance on Criminal Convictions: Prospective and Current Students

This guidance sets out how the college considers disclosed or discovered criminal convictions and cautions from current or prospective students at application and enrolment.

C.1 Purpose and status

This guidance applies alongside the college's Admissions Policy. Where any conflict arises between the guidance and the main policy body, the main policy body takes precedence, and the DSL should be consulted or in the DDSL in their absence of the DSL.

Buckinghamshire College Group operates a proportionate, individual-assessment approach. A conviction or caution does not automatically bar enrolment. Decisions are based on the nature and relevance of the offence, time elapsed, evidence of change, and the specific risks presented to the course, cohort, and or placement environment applied for.

C.2 Legal and policy framework

- Rehabilitation of Offenders Act 1974 (Exceptions Order 1975, as amended) — governs which convictions must be disclosed for roles/courses involving regulated activity or working with children/vulnerable adults.
- Keeping Children Safe in Education (KCSIE) 2025 — safer recruitment and safeguarding culture expectations, applied by extension to student safeguarding practice.
- Working Together to Safeguard Children 2023 (WT2023) — multi-agency information sharing principles.
- UK GDPR / Data Protection Act 2018 — Schedule 1, Part 2, safeguarding condition permits processing of conviction data without consent where necessary to protect a child or vulnerable adult.

C.3 Guiding principles

- No blanket exclusion: every disclosure is assessed on its individual facts.
- Proportionality: the level of scrutiny and conditions applied is proportionate to the actual risk presented, not the offence label alone.
- Honesty is protective: applicants who disclose fully and proactively are supported through a fair process; C.6 explains how withheld or minimised information is treated differently.
- Right to be heard: applicants are given the opportunity to provide context before a decision is finalised.
- Safeguarding primacy: where risk to children or vulnerable adults cannot be safely managed, this takes precedence over the applicant's preference of course or campus.

C.4 Disclosure at application

All applicants are asked at application stage whether they have any unspent convictions, cautions, or ongoing criminal proceedings, and separately whether they have ever been subject to safeguarding, Multi-Agency Public Protection Arrangements (MAPPA), or Prevent-related monitoring. Applicants for courses involving placements with children or vulnerable adults are asked to also disclose spent convictions covered by the Exceptions Order.

- Disclosures are made confidentially to Admissions and passed to the DSL/Deputy DSL/ Senior Safeguarding Officer within one working day or a reasonable timeframe
- A disclosure never automatically triggers rejection — it triggers the risk assessment process at C.5.
- Where information comes from a third party (YOT, social worker, probation officer, police) rather than self-disclosure, the same process applies but see C.6 for how this interacts with an applicant's own account.

C.5 Risk assessment process

On receipt of a disclosure or third-party information, the Senior Safeguarding & Prevent Officer follows this sequence:

1. Initial screen — Senior Safeguarding & Prevent Officer reviews nature, date, and disposal of the offence(s) against the course and placement profile.
2. Information gathering — with consent where possible, Senior Safeguarding & Prevent Officer contacts relevant agencies (YOT, probation, social care, police single point of contact) to confirm details and check MAPPA status.

- 3. Meeting with the applicant — applicant is invited to give their own account and evidence of any rehabilitation, support, or change in circumstances.
- 4. Escalation & Risk assessment panel — where there are significant concerns, DSL/Deputy DSL, Senior Safeguarding & Prevent Officer relevant Curriculum Lead, and SENDCO (if relevant) meet to weigh risk factors and assign a threshold (C.6).
- 5. Decision and conditions — panel recommends outcome; High and Non-negotiable thresholds require DSL/Vice Principal ratification.
- 6. Safety plan (if conditional) — named contacts, monitoring, information-sharing agreements, and a fixed review date are set out.
- 7. Recording — decision, rationale, and review date logged on CPOMS; template at Appendix C1.
- 8. Review — safety plans are reviewed at the fixed point or immediately if a new concern arises.

C.6 Risk thresholds

The following thresholds guide, but do not replace, professional judgement in the risk assessment panel. Every case is assessed on its full facts.

Threshold	Indicators	Examples	Enrolment outcome
LOW	Historic, non-violent, no relevance to course or placement setting; full disclosure given; no repeat pattern.	Single caution for minor theft 4+ years ago; motoring offence; offence unrelated to course subject or cohort.	Admit unconditionally. Note on file; no ongoing plan required.
MEDIUM	Some relevance to course, placement, or cohort; more recent; evidence of insight/rehabilitation; full voluntary disclosure.	Non-serious assault 1–3 years ago on a course with a work placement; possession offence on a health/social care pathway.	Admit with conditions: named contact, restricted placement access, defined review point (e.g. termly).
HIGH	Offence directly relevant to safeguarding of children/vulnerable adults; recent; limited evidence of insight; course involves unsupervised access to under-18s or vulnerable learners.	Sexual offence, offence against a child, or serious violence within 3–5 years; safeguarding or MAPPA involvement.	Admit only with substantial safeguards (no placement, no under-18 cohort, enhanced monitoring) — DSL and Exec. sign-off required. May be declined if risk cannot be safely managed.
NON-NEGOTIABLE	Risk cannot be safely managed in a mainstream FE setting given the course, cohort, or campus environment.	Current MAPPA Level 2/3 management; ongoing safeguarding investigation; pattern indicating continuing risk with no viable mitigation.	Decline enrolment on this course; explore alternative provision/pathway. Decision ratified by Vice Principals/DSL; written rationale retained.

C.7 Withholding or minimising information

How an applicant discloses matters as much as what they disclose. Concealment or minimisation is treated as a distinct safeguarding indicator in its own right — separate from, and in addition to, the risk presented by the underlying offence — because it removes the college's ability to assess and manage risk and may itself indicate a lack of insight or an intent to deceive.

Scenario	Why it matters	Response
Non-disclosure discovered before enrolment is confirmed (e.g. DBS/reference check reveals an undisclosed conviction).	The concealment itself — not only the underlying offence — removes the college's ability to assess and mitigate risk, and can signal minimisation or intent to deceive.	Escalate the risk threshold by at least one band above where the disclosed offence alone would sit. Pause enrolment pending a DSL-led risk assessment meeting, with the applicant given the opportunity to explain.
Non-disclosure discovered after enrolment.	Ongoing breach of the enrolment agreement's disclosure condition; live safeguarding risk as the college has been operating without full information.	Immediate DSL notification and CPOMS entry. Interim safeguards applied (e.g. suspend placement access) pending an urgent risk assessment meeting within 5 working days.
Partial or minimising disclosure (offence disclosed but nature/severity understated).	A pattern of minimisation can indicate lack of insight or ongoing risk, independent of the offence's original severity.	Treat as a disclosure concern in its own right; document the discrepancy; DSL to reassess the full picture rather than relying on the original account.
Applicant discloses fully and proactively, unprompted.	Proactive disclosure is a positive indicator of insight and should not be treated as equivalent to a concealment case.	Assess on the merits of the offence alone using the standard threshold table; disclosure itself is not an aggravating factor.

Key principle: withholding information is never treated as neutral. At minimum it triggers a mandatory DSL/DDSL review of the case; where a placement or under-18 cohort is involved, undisclosed information discovered after enrolment triggers immediate interim safeguards while the case is reassessed.

C.8 Roles and responsibilities

Role	Responsibility
Admissions Team	Ensures the disclosure question is presented at application; flags any disclosure to the DSL/Deputy DSL / Senior Safeguarding & Prevent Officer within 1 working day; does not make risk decisions.
DSL / Deputy DSL	Leads the risk assessment, gathers external agency information, chairs the risk assessment meeting, ratifies threshold and conditions, maintains the CPOMS record.
Curriculum/Course Lead	Advises on course-specific risk factors (placement exposure, cohort age/vulnerability, unsupervised contact).
SENDSCO (where relevant)	Advises where the applicant has additional needs that interact with risk or support planning.
Vice Principals / Exec.	Ratifies High and Non-negotiable threshold decisions; approves any decline-to-enrol outcome.

C.9 Decision outcomes

- Admit unconditionally — no ongoing safeguarding plan required.
- Admit with conditions — safety plan applied, named contacts, restricted access (e.g. no placement, supervised only), fixed review date.
- Decline this course, signpost alternative provision — used where risk cannot be safely managed in this setting; college supports the applicant to explore suitable alternatives where possible.
- Decline enrolment — used only at Non-negotiable threshold; ratified by Vice Principals/DSL with written rationale retained.

C.10 Right to review

An applicant may request a review of a decline decision, providing new information or context not available at the time of the original assessment. Reviews are considered by a DSL not involved in the original decision, or by the Vice Principals where the DSL made the original call.

C.11 Recording and information sharing

- All disclosures, assessments, and decisions are recorded on CPOMS, restricted to safeguarding-authorized staff.
- Information is shared with external agencies under the UK GDPR Schedule 1 safeguarding condition; consent is sought where possible but is not a precondition where there is a risk to a child or vulnerable adult.
- Where the case involves an allegation against a staff member arising from a student disclosure, LADO referral procedures apply in parallel, as per guidance in the policy.
- Where a conviction or disclosure relates to extremism, the case is also referred through Prevent duty procedures, as per guidance in the policy.

APPENDIX 6 - Low-Level Concerns Procedure

A low-level concern is any concern - no matter how small, and even if seemingly unsubstantiated or unintentional - that an adult's behaviour towards a child, young person or vulnerable adult has been inappropriate, but does not meet the threshold of a formal allegation of abuse or serious misconduct.

Examples may include:

- Being over-friendly with students beyond what is appropriate for the professional relationship.
- Having favourites among students.
- Taking a student home or offering lifts unnecessarily.
- Using inappropriate humour or language with students.
- One-off breaches of the no-contact approach that appear accidental or well-intentioned rather than malicious.

Procedure:

- Low-level concerns should be reported to the Designated Safeguarding Lead or Executive Director of People and Purpose as soon as possible, and always within the same working day where practicable.

- All low-level concerns are recorded, even where no further action is required, to allow patterns to be identified over time.
- Most low-level concerns will be resolved informally, for example through a supportive conversation, reminder of expectations, or reference to the Staff Code of Conduct, and will not constitute a disciplinary matter.
- Where a pattern of low-level concerns emerges about the same individual, or a concern raises the level of risk, it will be escalated and managed under the Allegations Against Staff procedure.
- Staff are supported and encouraged to raise low-level concerns about colleagues without fear of disproportionate consequences; a culture that discourages reporting is itself a safeguarding risk.

APPENDIX 7 - Reporting a Safeguarding Concern: Step-by-Step

1. A student, colleague, parent or member of the public raises a concern, or you observe something concerning.
 2. Do NOT investigate. Keep the person safe. Listen, do not promise confidentiality. Note exactly what was said or observed as soon as possible, using their own words.
 3. Is there an immediate risk to life or immediate serious risk of harm? If YES, call 999 immediately, then inform the DSL/DDSL/Senior Safeguarding & Prevent Officer. If NO, report to the campus Safeguarding & Prevent Officer or in their absence, DSL/DDSL/Senior Safeguarding & Prevent Officer the same day.
 4. Record the concern on CPOMS without delay.
 5. The Safeguarding & Prevent Team assesses the concern and decides next steps: internal support, referral to MASH/social care, LADO referral (staff allegations, within 24 hours), Prevent/Channel referral, or NRM referral (modern slavery/trafficking).
 6. The outcome and any actions are recorded; the referrer is given appropriate feedback within the bounds of confidentiality.
- If you disagree with a decision not to act, use the escalation procedure referenced in Section 9 of this policy - do not let the matter drop.

APPENDIX 8 - Key Safeguarding Contacts

Designated Safeguarding Lead (DSL): Nicky Ellis - NEllis@buckscollegigroup.ac.uk

Deputy Designated Safeguarding Lead (DDSL): Vusa Nkomo – Vnkomo@buckscollegigroup.ac.uk

Senior Safeguarding & Prevent Officer: Samantha Roberson - SRoberson@buckscollegigroup.ac.uk

Prevent Lead: Vusa Nkomo – Vnkomo@buckscollegigroup.ac.uk

Designated Governor for Safeguarding:

Executive Director of People and Purpose: Ruth Osgood - Rosgood@buckscollegigroup.ac.uk

Local Authority Designated Officer (LADO): Buckinghamshire LADO - secure-lado@buckinghamshire.gov.uk or call 01296 382070

Safeguarding, Child Protection and Vulnerable Adults and Prevent Policy

MASH / First Response (Children): Buckinghamshire Children's Services - 01296 383962 (Out of hours: 0800 999 7677)

Adult Social Care (Vulnerable Adults): Buckinghamshire Adult Social Care

- ascfirstresponse@buckinghamshire.gov.uk or call 01296 383 204 , out of hours, call 0300 131 6000 and select option 2 for concerns about an adult.

Prevent Duty / Channel: Local Authority Prevent Coordinator - safeguardingadults@buckscc.gov.uk or call 0800 137 915

Police (non-emergency): Thames Valley Police - 101 (Emergency: 999)

Nursery Child Protection Manager: Carol Carlin - 01296 588594 / ccarlin@buckscollegigroup.ac.uk

Useful links

Bucks Local Authority procedures for safeguarding <https://www.buckssafeguarding.org.uk/childrenpartnership/>

Forced marriage <https://www.gov.uk/guidance/forced-marriage>

EBSNA <https://familyinfo.buckinghamshire.gov.uk/education-and-learning/improvinghttps://familyinfo.buckinghamshire.gov.uk/education-and-learning/improving-your-childs-school-attendance/emotionally-based-school-avoidance-ebnsa/your-childs-school-attendance/emotionally-based-school-avoidance-ebnsa/>

NSPCC <https://learning.nspcc.org.uk/safeguarding-child-protectionhttps://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-sendschools/safeguarding-children-with-special-educational-needs-and-disabilities-send>