

SAFEGUARDING AND CHILD PROTECTION POLICY

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This policy has been re written following changes to KCSiE, 2026. Colleagues are requested to read the policy in full.

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Safeguarding and Child Protection Policy

1. Introduction

- 1.1** UCS College Group has children and young adults across a wide range of settings, including further education, apprenticeships, work placements, residential provision, higher education, childcare provision and wider community or partner activity. The College Group also works with adult learners who may be vulnerable or at risk of abuse or neglect.
- 1.2** Safeguarding and promoting the welfare of children and our students (be they children or adults) is everyone's responsibility. This policy sets out the College Groups commitment to a safeguarding culture that is visible, understood, consistently applied and subject to regular assurance.
- 1.3** UCS College Group will continue to review safeguarding practice in response to statutory guidance and feedback from Ofsted, national and local trends, safeguarding audit outcomes, student and parent/carers voice, complaints, low-level concerns, casework themes and multi-agency safeguarding activity.
- 1.4** Where Safeguarding is concerned, staff are advised to maintain an attitude of 'it could happen here'. When there is uncertainty, UCS College Group will always act in the best interests of the child or student, seeking advice from the Safeguarding Team or external agency and take the course of action most likely to protect them from harm.

2. UCS College Group Safeguarding Principles

- 2.1** At UCS College Group, safeguarding is not a single process or a responsibility held by a small number of specialist staff. Safeguarding is a culture that permeates every aspect of College life. UCS College Group is committed to five safeguarding principles.

Principle	Definition
1. Student-centred safeguarding	The welfare, safety, voice and lived experience of the child or student will be at the heart of decision-making. Staff will listen, take concerns seriously, act promptly by following the correct reporting procedures and make decisions based on the safety and welfare whilst also complying with legislation.
2. Information sharing saves lives	Safeguarding concerns are rarely understood through a single piece of information. Staff will share relevant concerns, observations and professional judgements promptly, lawfully and appropriately, recording on MyConcern as appropriate.
3. Safeguarding is everyone's responsibility	Every member of staff may be the person a student chooses to tell. All staff must maintain professional curiosity, identify concerns, report them and contribute to a safe culture.
4. Early help changes outcomes	UCS College Group will identify emerging concerns early and provide support before difficulties escalate, such as through 1 to 1 tutorials, wellbeing support, counselling appointments, attendance, behaviour family help, social care or multi-agency support as appropriate.

5. Safeguarding needs could arise everywhere	Children and students could experience harm online, at home, in relationships, in communities, on placements, in residential provision, through employment, through peer groups and through digital technologies. Safeguarding arrangements therefore extend beyond the physical College environment and at UCS College Group we equip students to be able to respond to this as appropriate through our Tutorial package and clear reporting processes.
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3. Purpose and intent

3.1 The purpose of this policy is to provide clear expectations for safeguarding and child protection across UCS College Group. It is intended to ensure that staff understand their responsibilities, students are protected from harm, concerns are identified and acted upon promptly, and governance arrangements provide appropriate scrutiny and assurance.

3.2 UCS College Group will:

- a) Provide a safe learning, working and residential environment;
- b) support placement partners with their safeguarding practice;
- c) promote the welfare of children, young people and vulnerable adults;
- d) identify safeguarding concerns early and take timely action;
- e) share information where necessary to safeguard or promote welfare;
- f) work effectively with parents, carers, Virtual School (for Looked After Children), employers, local authorities, education, police, health, social care and any other safeguarding partner;
- g) ensure that safeguarding arrangements are applied consistently across all Colleges, provision types and partner activity;
- h) record concerns, decisions, rationale and outcomes accurately via MyConcern;
- i) review practice through audit, supervision, training and governance reporting.

4. Statutory framework and guidance

4.1 UCS College Group will act in accordance with relevant legislation, statutory guidance and local safeguarding partnership procedures. This includes, as applicable at the date of approval of this policy and is not an exhaustive list:

- a) Keeping Children Safe in Education 2026, effective from 1 September 2026;
- b) Working Together to Safeguard Children;
- c) Children Act 1989 and Children Act 2004;
- d) Education Act 2002, including duties relevant to further education institutions;
- e) Counter-Terrorism and Security Act 2015 and the Prevent Duty;
- f) Online Safety Act 2023;
- g) UK GDPR and Data Protection Act 2018;
- h) Sexual violence and sexual harassment between children in schools and colleges guidance;
- i) DfE digital and technology standards, including filtering and monitoring and cyber security standards;
- j) Working Together to Improve School Attendance statutory guidance;

- k) local safeguarding children partnership procedures;
 - l) OfS requirements relevant to higher education students, harassment and sexual misconduct
 - m) Further Education Residential Accommodation National Minimum Standards, 2026
 - n) Equality Act 2010
 - o) Restricted interventions and reasonable force, 2026
 - p) Crime and Policing Bill, 2026
 - q) Domestic Abuse Act, 2021
 - r) SEND Reform White Paper, 2026
 - s) SEND Special Educational Needs and Disability Act, 2001
- 4.2 Where new or updated statutory guidance is published during the academic year, the Group DSL will review the implications, update operational guidance and training as required, and report the implications through Safeguarding Committee, SMT and College SLTs and Governors.

5. Scope

- 5.1** This policy applies to all provision and activity delivered, commissioned or arranged by UCS College Group. This includes:
- a) all Colleges, centre, outreach activity and satellite provision;
 - b) further education, higher education, 14-16 provision and adult provision where safeguarding responsibilities arise;
 - c) apprenticeships, work experience, industry placements, work-based learning and employer settings;
 - d) alternative provision, subcontracted provision and partner provision;
 - e) residential provision and College accommodation;
 - f) our childcare setting;
 - g) online or remote learning and College digital platforms;
 - h) trips, visits, enrichment, events and off-site activity;
 - i) third-party use of College premises where children or vulnerable adults may be present.
- 5.2** This policy applies to all staff, agency staff, contractors, volunteers, governors, consultants, visitors, employers, placement providers and anyone working on behalf of or in partnership with the College Group. Where a student is placed with another provider, employer or third party, the College Group retains responsibility for ensuring that appropriate safeguarding arrangements are in place and that concerns are identified, shared and acted upon.

6. Definitions

For the purposes of this policy:

- a) A child is anyone who has not yet reached their 18th birthday.
- b) Safeguarding means protecting children from maltreatment, preventing impairment of health or development, ensuring children grow up in circumstances consistent with safe and effective care, and acting to enable the best outcomes.

- c) Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- d) A vulnerable adult is a person aged 18 or over who may be unable to protect themselves from abuse, neglect or exploitation because of care and support needs or other vulnerabilities.
- e) DSL means Designated Safeguarding Lead, they are an appropriate senior member of staff, from the college Group leadership team. The College DSL means the appointed Senior Member of the College Leadership Team or area.
- f) Safeguarding concern means any information, observation, disclosure or pattern that may indicate abuse, neglect, exploitation, risk of harm or unmet welfare need.

7. Roles and responsibilities

7.1 Governing Board

7.1.1 The Governing Board has strategic responsibility for ensuring that the College Group has effective safeguarding arrangements. Governors will:

- a) approve and review this policy annually;
- b) ensure that safeguarding is sufficiently resourced and prioritised;
- c) appoint a named safeguarding governor or governors;
- d) receive assurance reports on safeguarding performance, compliance and risk;
- e) scrutinise safeguarding audit outcomes, training compliance, Single Central Record assurance, filtering and monitoring and residential provision.
- f) ensure governors receive appropriate safeguarding and child protection training at induction and through regular updates.

7.2 The Senior Management Team and Group Senior Leadership Team

7.2.1 Senior leaders are responsible for ensuring that safeguarding is embedded in the culture, systems and daily practice of the College Group. They will ensure that staff understand expectations, safeguarding concerns are acted on, training is completed, and barriers to effective safeguarding are addressed.

7.3 Group Designated Safeguarding Lead

7.3.1 The Group DSL has overall responsibility for safeguarding leadership across UCS College Group and holds all responsibilities outlined in Keeping Children Safe in Education. They will:

- a) lead the development and implementation of the safeguarding and child protection policy;
- b) oversee referrals to children's social care and other statutory agencies where required;
- c) ensure safeguarding training, briefings and updates are provided and monitored;
- d) promote timely and lawful information sharing and ensure decisions are recorded;
- e) ensure safeguarding records are managed securely and transferred appropriately;
- f) oversee online safety, filtering and monitoring from a safeguarding perspective;
- g) be the key point of contact for the Local Authority Designated Officers
- h) attend new staff welcome to give a safeguarding overview;
- i) ensure arrangements for alternative provision, placements, apprenticeships and residential provision are subject to assurance;

- j) provide weekly safeguarding reports during term time and half termly summary reports to the Senior Management Team;
- k) meet fortnightly with the Safeguarding Leadership Team (all DSLs, Team Leaders and Residential Manager);
- l) meet with the Childcare Centre Manager on a fortnightly basis;
- m) chair Safeguarding Committee;
- n) meet with College Safeguarding Teams on a half termly basis to internally audit cases;
- o) meet with the Safeguarding Governors, sharing half termly Safeguarding reports;
- p) produce annual College specific safeguarding culture papers;
- q) receive external supervision via the Safeguarding Network.

7.3.2 The Group DSL is Bethan Foweraker: Fowerakerb@ucscollegegroup.ac.uk

7.4 The College DSLs

7.4.1 The College DSL has overall responsibility for safeguarding leadership and culture across their College. They will:

- a) chair weekly Safeguarding meetings during term time with the Safeguarding Officers at their College
- b) share the weekly and half termly Safeguarding reports with their College Senior Leadership Teams
- c) support staff to understand and act on their safeguarding responsibilities;
- d) monitor case load;
- e) deliver face to face safeguarding training;
- f) ensure safeguarding training, briefings and updates are monitored;
- g) ensure safeguarding records are managed securely and transferred appropriately;
- h) attend Safeguarding Committee to represent the student need at their College;
- i) challenge and escalate where internal or external responses do not adequately protect a child or vulnerable student;
- j) ensure Safeguarding policies and procedures are followed at their College;
- k) receive external supervision via the Safeguarding Network

7.4.2 The College DSLs are:

- a) Jane Irons (Bridgwater College): IronsJ@ucscollegegroup.ac.uk
- b) Helen Windsor (Cannington College): WindsorH@ucscollegegroup.ac.uk
- c) Bayley Chatwin (Strode College): ChatwinB@ucscollegegroup.ac.uk
- d) Keira Scott (Taunton College): ScottK@ucscollegegroup.ac.uk

7.5 The Crockers DSL

7.5.1 The Crockers DSL has overall responsibility for safeguarding leadership and culture across their area of responsibility. Working with Cannington College DSL, they will:

- a) support staff to understand and act on their safeguarding responsibilities;
- b) monitor case load and report on cases to college DSL, meeting with Group DSL once a half term;
- c) ensure 14-16 specific safeguarding measures are in place;
- d) ensure safeguarding records are managed securely and transferred appropriately;
- e) attend Safeguarding Committee to represent the student need at their campus;

- f) challenge and escalate where internal or external responses do not adequately protect a child or vulnerable learner;
- g) ensure Safeguarding policies and procedures are followed at their area;
- h) ensure that all staff at Crockers have annual refresher Crisis Prevention Intervention (CPI) training and that the DSL has their annual refresher instructors training;
- i) receive external supervision via the Safeguarding Network.

7.5.2 The Crockers DSL is Becc Baker: BakerB@ucscollegegroup.ac.uk

7.6 Safeguarding Team Leaders

7.6.1 Safeguarding Team Leaders provide operational safeguarding leadership. They will receive concerns, assess risk, make or support referrals, coordinate support, liaise with external agencies, maintain records, advise staff and monitor cases to avoid drift.

7.6.2 Safeguarding Team Leaders are also the Designated Teacher for their College and a key point of contact for staff supporting a Child Looked After.

7.6.3 The Safeguarding Team Leaders are:

- a) Roberta Vaughan (Bridgwater College): VaughanR@ucscollegegroup.ac.uk
- b) Katie Wilson (Cannington College)
- c) Charles Bedingfield (Strode College) BedingfieldC@ucscollegegroup.ac.uk
- d) Sophie Dodd (Taunton College) DoddS@ucscollegegroup.ac.uk

7.7 Childcare Centre Manager

7.7.1 The Childcare Centre Manager is the DSL for the Childcare setting and has overall responsibility for safeguarding leadership and culture across the Childcare Centre. They will:

- a) line manage the Childcare Centre Deputy DSL;
- b) support staff to understand and discharge safeguarding responsibilities;
- c) monitor case load;
- d) deliver face to face safeguarding training;
- e) ensure safeguarding training, briefings and updates are monitored;
- f) ensure safeguarding records are managed securely and transferred appropriately;
- g) attend Safeguarding Committee to represent the Childcare Centre;
- h) challenge and escalate where external responses do not adequately protect a child or vulnerable learner;
- i) ensure Safeguarding policies and procedures are followed for Early Years, the Childcare Centre adheres to the EYFS Statutory Framework - [Safeguarding Requirements Early years foundation stage \(EYFS\) statutory framework - GOV.UK](#). As a consequence, the Childcare Centre also have their own safeguarding policy, which is also reviewed in line with KCSiE.
- j) Receive external supervision via the Safeguarding Network

7.7.2 The Childcare Centre Manager is Caren Egan: EGANC@ucscsl.co.uk

7.8 Residential Manager

7.8.1 The Residential Manager is responsible for the Residential provision at UCS College Group and works alongside the College DSL to provide leadership and culture across

the Residential setting ensuring compliance with the Ofsted National Standards for FE Colleges. They will:

- a) line manage two Deputy Managers, who are also safeguarding officers
- b) chair weekly Residential Safeguarding meetings with these Deputy Managers to complete case reviews and allocate tasks
- c) monitor case load;
- d) ensure Residential safeguarding, wellbeing and behaviour concerns are recorded, monitored and reviewed effectively, with appropriate actions taken and outcomes evaluated.
- e) review Residential cases and student profiles with professional curiosity, taking a holistic approach to behaviour, wellbeing and safeguarding concerns to identify emerging risks and ensure timely and effective early intervention;
- f) attend Safeguarding Committee to represent the Residential provision;
- g) challenge and escalate where internal or external responses do not adequately protect a child or vulnerable student;
- h) receive external supervision via the Safeguarding Network

7.8.2 The Residential Manager is Charlotte Wade: WadeC@ucscollegegroup.ac.uk

7.9 Safeguarding Officers

7.9.1 All Safeguarding Officers at UCS College Group are all trained to Advance Child Protection (Level 3) provided by Somerset Safeguarding Children Partnership.

7.9.2 All Safeguarding Officers have access to MyConcern and will manage individual Safeguarding Cases, supported by their College Safeguarding Team Leader and DSL.

7.9.3 All Safeguarding Officers will meet with their College DSL during a weekly case review meeting.

7.9.4 Supervision and support are provided to Safeguarding Officers by their DSL/alternative DSL as required.

7.9.5 All Safeguarding Officers at UCS College Group can be found on the [Safeguarding Sharepoint Page](#).

7.10 All staff

7.10.1 All staff must:

- a) read and confirm understanding of the relevant KCSIE requirements identified by the College Group;
- b) complete mandatory annual safeguarding training and updates within the required timeframe;
- c) act immediately where they have a safeguarding concern during working hours;
- d) record concerns accurately and promptly using MyConcern;
- e) share information where necessary to safeguard or promote welfare;
- f) not promise confidentiality where safeguarding risks may exist;
- g) maintain appropriate professional boundaries and follow our Professional Expectations;
- h) report any claims of child sexual abuse (be that historic or recent) immediately to a Safeguarding Officer
- i) report allegations, low-level concerns and concerns about adults without delay;

- j) read and respond to communication from students during their working hours only (eg email, Teams messages)
- k) seek advice from a Safeguarding Officer where they are unsure, while not delaying urgent safeguarding action.

7.11 Group DSL or College DSL absence

7.11.1 During term time the Group DSL or a College DSL should always be available (during college working hours) for staff in the college to discuss any safeguarding concerns. Whilst, the Group DSL and College DSLs would be available in person, these roles could be in one of several College locations or could also be in external meetings. DSLs will always be contactable via their work phone or Microsoft Teams account. There is always a Safeguarding Officer on each College site during term time other than in exceptional circumstances. If this circumstance does occur, support is readily available from the Group Safeguarding Team.

7.11.2 A Safeguarding rota is in place outside of term time, other than during the Christmas closedown period. All staff are sent this safeguarding rota via email and can be found via the Safeguarding SharePoint site. For out of hours activities, Duty Managers have access to the Group DSL and the Residential Team have an escalation route to College DSL, Group DSL or College Principal.

7.11.3 A confidential shared inbox, StaySafe@ucscollegegroup.ac.uk, is monitored during working hours on a rota within the Safeguarding Team, as is MyConcern to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

8. Our Students

8.1 Student-centred safeguarding in practice

8.1.1 Student-centred safeguarding means beginning with the question: "What is happening for this child or student, and what do they need from us right now?"

8.1.2 UCS College Group will listen to students, seek their wishes and feelings where appropriate, and record their voice within safeguarding decision-making. The College recognises that protective action may still be required even where a child or student does not wish information to be shared, particularly where there is risk of significant harm, there has been a sexual assault, exploitation, abuse, neglect or risk to others.

8.1.3 Staff will be professionally curious. They will consider and record on MyConcern changes in behaviour, presentation, attendance, peer relationships, digital behaviour, home circumstances, placement experiences, residential welfare, mental health and wider context. Seemingly low-level concerns may be significant when viewed as a piece of a larger puzzle.

8.2 Students who may be at greater risk of harm

8.2.1 Some students may face additional barriers to recognising, disclosing or escaping abuse, neglect or exploitation. UCS College Group will apply additional vigilance and support where appropriate. This may include students who:

- are looked after, previously looked after, care experienced or in kinship care;
- have a social worker or have previously had social care involvement;

- have SEND, neurodivergence, communication needs or learning difficulties;
 - are young carers or living independently;
 - are vulnerable to homelessness, poverty, family stress or isolation;
 - are persistently or repeatedly absent from education, placement or residential activity;
 - are experiencing mental health difficulties, self-harm or at risk of suicide;
 - are at risk of child sexual exploitation, child criminal exploitation, serious violence, modern slavery or trafficking;
 - are affected by domestic abuse, family conflict or coercive control;
 - are questioning their gender or experiencing identity-related distress, bullying or discrimination;
 - are affected by racism, misogyny, misandry, harassment, sexual violence, bullying or prejudice;
 - are in residential provision, work placements, apprenticeships or other settings away from immediate College supervision.
 - are Elected Home Educated students and have not been in an education setting for some time
- 8.2.2** Staff who are made aware of the above, eg are Looked After Children, must inform the Safeguarding Team as soon as they are aware to ensure the relevant support is put in place for them.
- 8.2.3** UCS College Group will not attribute indicators of abuse, neglect, exploitation or emotional distress solely to SEND, disability, neurodivergence, mental health or behaviour. Concerns must be reported and considered on a case by case basis.

9. Children who are questioning their gender

- 9.1** UCS College Group recognises that some children may question their gender and may require sensitive, thoughtful and supportive responses. Requests or disclosures relating to gender identity will be considered through a safeguarding and wellbeing lens, with decisions focused on the best interests of the child or young person and the welfare of all students.
- 9.1.1** In line with KCSiE, UCS College Group will:
- a) respond to students with dignity, respect and sensitivity;
 - b) ensure students are listened to and supported appropriately;
 - c) consider each situation on an individual basis;
 - d) assess any safeguarding, wellbeing, mental health or vulnerability factors;
 - e) maintain clear and accurate records of decisions and actions taken;
 - f) seek advice from the Designated Safeguarding Lead where appropriate.
- 9.1.2** The College recognises that children and young people questioning their gender may experience additional vulnerabilities, including:
- a) anxiety and emotional distress;
 - b) bullying, harassment or discrimination;
 - c) social isolation;
 - d) online exploitation or harmful online influence;
 - e) difficulties within family, peer or community relationships;
 - f) mental health concerns.

- 9.1.3** Where a student raises questions regarding their gender identity or requests support relating to social transition eg name changes and pronouns, the matter will be considered carefully and in accordance with current statutory guidance, safeguarding responsibilities, equality duties and the individual circumstances of the student. Decisions will not be made by individual members of staff in isolation and will be considered through appropriate safeguarding processes.
- 9.1.4** Parents/carers/virtual school will normally be involved in discussions and decision-making unless there is reason to believe that doing so may place the child or young person at risk of harm. In such circumstances, the College Designated Safeguarding Lead will determine the most appropriate course of action and the rationale for this will be recorded on MyConcern.
- 9.1.5** UCS College Group will not tolerate bullying, victimisation, harassment or discrimination related to gender identity, gender questioning, sex, sexual orientation or any other protected characteristic. Any concerns will be managed through the College's Positive Behaviour Policy and Behaviour Management Procedure or through the Staff Disciplinary Policy and Procedure.
- 9.1.6** Staff should report concerns to the Safeguarding Team where:
- a) a student appears distressed or vulnerable in relation to gender identity issues;
 - b) there are concerns regarding self-harm, at risk of suicide or poor mental health;
 - c) there is evidence of bullying, harassment or abuse;
 - d) concerns arise regarding online activity, grooming, coercion or exploitation;
 - e) family conflict presents a safeguarding concern;
 - f) there is uncertainty regarding the most appropriate safeguarding response.
- 9.2** Facility use for Gender Questioning Children
- 9.2.1** UCS College Group recognises that requests relating to toilets, changing facilities, residential accommodation, sporting activities, visits and other arrangements require careful consideration.
- 9.2.2** Decisions will be:
- a) considered on an individual basis;
 - b) informed by safeguarding and welfare considerations;
 - c) based on risk assessment where appropriate;
 - d) documented and reviewed;
 - e) informed by relevant legislation and statutory guidance and will follow College Group policies;
 - f) considered by appropriate senior leaders and safeguarding staff.
- 9.2.3** The College will seek to balance:
- a) the welfare and dignity of the child or young person making the request;
 - b) the privacy, dignity and safety of other students;
 - c) safeguarding responsibilities;
 - d) equality duties;
 - e) operational requirements.
- 9.2.4** Where requests are made regarding access to toilets or changing facilities, the College will undertake an individual assessment taking account of:
- a) safeguarding considerations;
 - b) privacy and dignity for all students;

- c) age and maturity;
- d) any vulnerabilities identified;
- e) available facilities;
- f) views of the student;
- g) views of parents/carers/virtual school where appropriate.

9.2.5 The outcome and rationale will be recorded and reviewed periodically.

9.3 Residential Accommodation

9.3.1 Where a student accessing residential accommodation is questioning their gender, the Residential Manager and College DSL will complete a follow up interview and recorded on MyConcern.

9.3.2 Considerations will include:

- a) the needs and wishes of the student;
- b) safeguarding risks;
- c) privacy and dignity;
- d) the needs of other residents;
- e) sleeping arrangements;
- f) supervision requirements;
- g) medical or professional advice where appropriate.

9.4 Educational Visits and Residential Trips

9.4.1 Prior to overnight visits, residential activity or overseas travel, leaders will ensure that appropriate risk assessments consider:

- a) accommodation arrangements;
- b) room allocation;
- c) supervision;
- d) privacy and dignity needs;
- e) safeguarding requirements;
- f) welfare risks.

9.4.2 Statutory Guidance suggests that those transitioning from a gender not assigned to them at birth should ideally be offered accommodation on their own. Where this is not possible, further discussions must take place with the Party Leader and College DSL and appropriate College Group Policies will be followed.

10. Student Criminal Convictions, Police Investigations and Risk Management

10.1.1 UCS College Group is committed to supporting rehabilitation, inclusion and positive educational outcomes. The existence of a criminal conviction does not automatically prevent an applicant from studying at UCS College Group.

10.1.2 The Group has a duty to provide a safe environment for students, staff and visitors and may need to undertake safeguarding and risk assessments where an applicant's criminal conviction, ongoing investigation, bail conditions, court order or other legal restriction may present a risk to themselves or others. This also applies to students who are already on role and become involved in criminal conviction or police investigation.

10.1.3 Applicants who declare a criminal conviction will be contacted by the Group DSL where this information is necessary to support safeguarding, residential

accommodation, work placements, apprenticeships, professional courses or the management of risk. Students who declare similar will follow the suitability to study procedure.

- 10.1.4** Where concerns are identified, the College may implement appropriate support and risk assessments, including placement restrictions, residential conditions or multi-agency working arrangements.
- 10.1.5** Decisions will be made on an individual basis, taking account of the nature of the concern, the level of risk, professional advice, evidence of rehabilitation and the College's safeguarding responsibilities.
- 10.1.6** Failure to disclose information that has been specifically requested and is relevant to safeguarding or placement requirements may result in a review under the College's Positive Behaviour Policy and Behaviour Management Procedure, safeguarding or suitability to study procedures.

11. Safeguarding procedures

- 11.1** This policy is supported by a suite of operational procedures. Procedures are designed to give staff at UCS College Group clear, practical steps for consistent implementation across Colleges, campuses and provision types. The required procedures are listed in Appendix A and can all be found on Sharepoint.
- 11.2** Staff should seek a DSLs advice and guidance if feel a local procedure conflicts with any statutory guidance.
- 11.3** All procedures are reviewed annually and agreed by the Safeguarding Leadership Team (consisting of the Group DSL, DSLs, Safeguarding Team Leader and Residential Manager). These are all available on the Groups Safeguarding Sharepoint.

12. Responding to concerns, disclosures and referrals

- 12.1** All safeguarding concerns must be reported immediately to the DSL, College DSL, Safeguarding Team Leader, Childcare Centre Manager, Residential Manager or Safeguarding Officer. Staff must never assume someone else will act.
- 12.2** When a student makes a disclosure, staff must listen, reassure, avoid leading questions, will not promise confidentiality, record the student's words as accurately as possible and report the concern on MyConcern without unnecessary delay.
- 12.3** Where a student is at immediate risk, staff must contact emergency services, police and/or children's social care as appropriate, working with the College DSL and Duty Manager.
- 12.4** The Safeguarding Team available will assess risk and determine whether internal support, Family Help, a statutory referral, police contact, Prevent/Channel referral, medical support, parental/carer/virtual school contact or other action is required. This decision could be made via calling Family Front Door or the Police for advice and Guidance. Who was contacted, the decision made, along with the rationale must be recorded on MyConcern.

13. Information sharing and confidentiality

- 13.1** Safeguarding and promoting the welfare of children depends on timely, lawful and proportionate information sharing. UCS College Group recognises that data protection legislation does not prevent information sharing where it is necessary to safeguard or promote welfare. The safety and welfare of the child or student will be the primary consideration.
- 13.2** Staff must not promise complete confidentiality. Where a student shares information that indicates safeguarding risk, staff must explain sensitively that information may need to be shared with those who can help keep them or others safe.
- 13.3** Information sharing should be necessary, relevant, proportionate, accurate, timely and secure. Decisions to share or not share information must be recorded with rationale. Where staff are unsure, they must seek advice from the Group DSL, College DSL or Data Protection Officer, but this must not delay urgent safeguarding action.

14. Record keeping and safeguarding systems (MyConcern)

- 14.1** Safeguarding records must be accurate, timely, factual and sufficiently detailed to evidence concerns, decisions and actions. Records must distinguish clearly between fact, professional judgement and third-party information.
- 14.2** Records must include, where relevant:
- student details and source of concern;
 - date, time, location and context;
 - what was said, using the student's own words where possible;
 - observable facts and presentation;
 - risk assessment and vulnerability factors;
 - actions taken and by whom;
 - information shared, with whom, when and why;
 - referrals made and feedback received;
 - rationale for decisions, including decisions not to act or refer;
 - review dates, outcomes and escalation.
- 14.3** Safeguarding records will be subject to quality assurance to ensure timely action, clear chronology, meaningful student voice, appropriate closure and avoidance of drift.
- 14.4** MyConcern is monitored by the safeguarding Team when the College is open to all students (Monday-Friday, 08:30-17:00 and 16:30 on a Friday). Any concerns raised outside of this time will be picked up the next working day. Students within a residential setting will have a Safeguarding Officer on shift each day and will be supported accordingly.

15. Online safety, filtering, monitoring and AI-enabled harm

- 15.1** Online safety is safeguarding. UCS College Group recognises that students may experience harm through content, contact, conduct and commerce, including online grooming, sexual harassment, cyberbullying, exploitation, radicalisation, self-harm content, coercive control, online fraud, harmful challenges, misinformation, disinformation, conspiracy theories, AI-generated content and deepfakes.
- 15.2** UCS College Group will maintain appropriate filtering and monitoring systems and will review their effectiveness at least annually. Reviews will include safeguarding leaders and IT and will consider student age and needs, known risks, incident data,

system reports, curriculum use, AI-enabled risks and emerging technologies. This will be reported on in Safeguarding Committee to Governors.

- 15.3** AI committee will report to the Safeguarding Committee and vice versa to ensure that the use of AI is used safely and responsibly with the UCS College Group Community.
- 15.4** Where online concerns are identified, they will be treated as safeguarding concerns and referred through the College safeguarding route. Evidence must be handled carefully and staff must seek DSL advice before viewing, forwarding, copying or storing any potentially illegal or harmful material.

16. Identification, Lanyards and Visitor Security

- 16.1** Maintaining a secure environment is an important aspect of safeguarding.
- 16.2** All staff, students, governors, contractors, agency workers and approved visitors are expected to comply with College identification requirements. Lanyards must be worn around the neck of the individual at all times.
- 16.3** The College requires:
 - a) staff to wear and display their College identification badge and lanyard whilst on duty;
 - b) visitors and contractors to sign in and wear authorised visitor identification;
 - c) students to wear their College identification around their neck (lanyard) or on their person (sticker for those who have forgotten their lanyard);
 - d) staff to challenge, where appropriate and safe to do so, individuals who are not displaying authorised identification;
 - e) concerns regarding unidentified individuals to be reported immediately to Reception or a Duty Manager who will escalate as appropriate to the College Senior Leadership Team.
- 16.4** The purpose of the College lanyard and identification system is to support safeguarding, strengthen site security and enable students to readily identify authorised staff and visitors.
- 16.5** Reasonable adjustments will be considered where required because of disability, medical need or other protected circumstances, but these are only to be authorised by College DSLs, who will retain an accurate record of those with these reasonable adjustments.

17. Attendance, children absent from education and disengagement

- 17.1** Attendance is a safeguarding indicator as well as an educational measure. UCS College Group will consider persistent absence, repeated unexplained absence, sudden disengagement, absence from placements, absence from alternative provision and absence from residential activity through a safeguarding lens. Attendance is monitored regularly in accordance with the Groups Attendance and Retention Strategy.
- 17.2** Attendance concerns will be reviewed alongside safeguarding records, behaviour, SEND, medical needs, mental health, placement information, residential welfare, family context and any agency involvement. Where absence creates or indicates risk, the College Safeguarding Team will involve parents/carers, social care, police, Virtual School, employers, providers or other agencies as appropriate.

18. Child-on-child abuse, sexual violence and harmful sexual behaviour

- 18.1** Abuse is abuse, regardless of who perpetrates it. UCS College Group will not minimise harmful behaviour as banter, relationship issues, experimentation or part of growing up.
- 18.2** Child-on-child abuse may include bullying, cyberbullying, prejudice-based abuse, sexual harassment, sexual violence, harmful sexual behaviour, abuse in intimate personal relationships, consensual and non-consensual sharing of self-generated intimate images, AI-generated intimate images or deepfakes, physical violence, initiation or hazing, coercion, exploitation and harmful online conduct.
- 18.3** Reports will be taken seriously. Victims will be supported and alleged perpetrators will be managed in a way that protects all students and preserves fairness and due process. The College will consider safeguarding, behaviour, disciplinary, criminal, residential, placement and OfS-related implications depending on context and age/status of those involved. Students are able to report these concerns to any member of staff or via the 'it's no excuse' posters around all sites.

19. Safer recruitment, staff conduct and low-level concerns

- 19.1** UCS College Group is committed to ensuring that unsuitable people do not gain access to children or vulnerable students through employment, volunteering, contracting, placement supervision, governance, residential activity or third-party provision.
- 19.2** Recruitment will follow safer recruitment requirements, including appropriate checks (including online), references, identity checks, right to work checks, DBS and barred list checks, online searches and maintenance of the Single Central Record.
- 19.3** All staff must follow the Professional Expectations and safer working practices. Low-level concerns must be reported and recorded so that patterns, repeated behaviours or themes can be identified and addressed. The Group DSL and People and Culture, along with relevant senior leaders will consider whether concerns indicate wider cultural, training, supervision or practice issues.

20. Allegations against staff and adults working with students

- 20.1** Concerns or allegations about staff, agency staff, contractors, volunteers, governors, residential staff, adults working on behalf of the College, or people using the College Group premises must be reported immediately in line with the Allegations Against Staff procedure.
- 20.2** Allegations must be considered where behaviour has harmed a child, may have harmed a child, might pose a risk of harm to children, or indicates that the person may not be suitable to work with children. Behaviour outside College, including online, personal or community conduct, may also be relevant.
- 20.3** The Group DSL, working with the Executive Director of People & Culture will follow local allegations management procedures, seek LADO advice where required, avoid inappropriate internal investigation before external advice, support those involved and record decisions and outcomes clearly. Any concerns staff have must be raised with People & Culture or the Group DSL immediately, to comply with the statutory 24hour reporting window. Staff who fail to comply with this may be subject to a low-level concern being raised on their inability to report in a prompt manner.

21. Alternative provision, apprenticeships, work placements and residential provision

- 21.1** Safeguarding arrangements extend to all learning and living environments. Before a student starts alternative provision, subcontracted provision, work experience, industry placement, apprenticeship placement or other work-based learning, UCS College Group will complete safeguarding due diligence proportionate to the arrangement.
- 21.2** Due diligence will include written confirmation of safeguarding contacts, safer recruitment arrangements, supervision, reporting routes, risk assessment, health and safety arrangements and any specific student vulnerabilities or support needs that must be shared.
- 21.3** Students will be told how to raise a concern while on placement, with an employer, at alternative provision or in residential accommodation.
- 21.4** Where a provider, employer or residential arrangement does not respond appropriately to safeguarding concerns, UCS College Group will escalate, suspend activity where necessary and make referrals to safeguarding partners, police or regulators as appropriate. This could also result in UCS College Group deciding to part ways with the organisation.
- 21.5** Students out with a provider will always receive check ins with staff members during their placement.

22. Prevent, serious violence, exploitation and extra-familial harm

- 22.1** UCS College Group recognises that safeguarding risks may arise through radicalisation, serious violence, child criminal exploitation, child sexual exploitation, modern slavery, trafficking, county lines, cuckooing, online influence, peer groups, neighbourhoods, public spaces, transport, workplaces and residential settings.
- 22.2** Prevent concerns will be referred through College safeguarding routes to the Prevent Single Point of Contact (the Group DSL) and considered for Channel referral where appropriate. Staff will be trained to recognise possible indicators including online radicalisation, extremist narratives, misinformation, disinformation, conspiracy theories, misogynistic content, grievance-based ideologies and exploitation by others.
- 22.3** Any concern that a student is carrying, using, obtaining, advertising, distributing or expressing intent to use a weapon must be treated as a safeguarding concern and reported immediately. UCS College Group will prioritise immediate safety, consider police contact and manage risks through safeguarding and behaviour procedures as appropriate.

23. Training, communication and safeguarding culture

- 23.1** Safeguarding training will be provided at induction, through annual updates and through role-specific training. Training will include, as relevant to role: student-centred safeguarding, information sharing, family help, disclosures and referrals, online safety, AI-enabled harm, attendance-related safeguarding risk, child-on-child abuse, harmful sexual behaviour, Prevent, serious violence, exploitation, low-level concerns, allegations against staff, safer working practice, filtering and monitoring, residential safeguarding and placement/apprenticeship safeguarding.

- 23.2** Training completion will be monitored. Managers must address non-completion promptly and may restrict access to relevant duties or systems where training is required for safe practice.
- 23.3** Students will be taught how to keep themselves and others safe through introduction, tutorial, curriculum, enrichment, learner voice and targeted support. UCS College Group will use student voice, surveys, forums, safeguarding records, complaints and incident data to understand whether students feel safe and to identify areas for improvement.

24. Governance, quality assurance and review

- 24.1** This policy will be reviewed annually and earlier where statutory guidance, legislation, local procedures, safeguarding audit, inspection findings, serious incidents or casework learning indicate that change is required.
- 24.2** The annual safeguarding assurance cycle will include:
- a) KCSIE and statutory guidance changes;
 - b) training completion and KCSIE read-and-confirm compliance;
 - c) Single Central Record and safer recruitment assurance;
 - d) safeguarding case audit;
 - e) information sharing and record keeping audit;
 - f) low-level concerns and allegations trend review;
 - g) online safety, filtering and monitoring review;
 - h) attendance safeguarding analysis;
 - i) residential safeguarding audit and National Minimum Standards assurance where applicable;
 - j) student voice and safe culture evidence;
 - k) Prevent, serious violence, exploitation and contextual safeguarding themes;
 - l) actions from audits, complaints, serious incidents and external reviews.
- 24.3** The Safeguarding Committee will monitor implementation of the policy and associated procedures and report assurance to SMT and Governors.

Appendix 1: Staff facing policies & procedures

UCS College Group has a Safeguarding Operating Framework which includes all key operating procedures within the Safeguarding Team. Other procedures are available for all staff on the Safeguarding Sharepoint page.

Staff facing policies & procedures	Location for staff
Responding to disclosures and safeguarding referrals	Safeguarding Procedures Page
Staff Guidance on how to use MyConcern	In documents section on Safeguarding Sharepoint
Mandatory reporting of child sexual abuse procedure	Safeguarding Procedures Page
Information sharing and Data Sharing Agreement procedure	Policy Pages
Bag Search Procedure	Safeguarding Procedures Page

Family Help and threshold escalation procedure	Within the Safeguarding Operational Framework , found in documents section on Safeguarding Sharepoint
Attendance and Retention Strategy (includes children absent from education and safeguarding attendance procedure)	Attendance and Retention Strategy
Alternative provision, subcontractor and work placement safeguarding procedure	Policy Pages
Online Safety, including Filtering and Monitoring	Policy Pages
AI-enabled harm and self-generated intimate images procedure	Safeguarding Procedures Page
Serious violence, weapons procedure	Safeguarding Procedures Page
Child-on-child abuse, harmful sexual behaviour and sexual violence procedure	Safeguarding Procedures Page
Low-level concerns	Policy Sharepoint Pages
Allegations against staff and LADO procedure	Safeguarding Procedures Page
Safeguarding case audit and supervision procedure	Safeguarding Procedures Page
Prevent and Channel referral procedure	Safeguarding Procedures Pages
Student voice and safe culture procedure	Safeguarding Procedures Pages
Safeguarding training and compliance procedure	Safeguarding Procedures Pages
Transfer of safeguarding records procedure	Safeguarding Procedures Page
Use of reasonable force / restrictive intervention procedure	Safeguarding Procedures Pages
Whistleblowing policy	Policy Sharepoint Pages

Appendix 2: Definitions and indicators of abuse

This appendix provides a concise reference for staff. It does not replace KCSIE, safeguarding training or DSL advice. Staff must report any concern even where they are unsure whether a threshold is met.

Area	Definition / indicators
Physical abuse	May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricated or induced illness, or any action causing physical harm.
Emotional abuse	Persistent emotional maltreatment which may damage emotional development, including conveying worthlessness, silencing, bullying, humiliation, intimidation, isolation, exploitation or seeing/hearing domestic abuse.
Sexual abuse	Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This includes contact and non-contact abuse, online sexual abuse and image-based abuse.
Neglect	Persistent failure to meet basic physical or psychological needs, likely to result in serious impairment of health or development. It may involve inadequate supervision, food, clothing, shelter, medical care or emotional support.
Child sexual exploitation	A form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.
Child criminal exploitation	A form of abuse where a child is exploited into criminal activity. A child cannot consent to exploitation.
Extra-familial harm	Harm occurring outside the family home, including in peer groups, neighbourhoods, online environments, public spaces, workplaces, placements and residential settings.
Harmful sexual behaviour	Sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful to self or others, or may be abusive.
Online harm	Risks arising from online content, contact, conduct or commerce, including grooming, exploitation, harassment, bullying, radicalisation, coercion, misinformation, AI-generated content and deepfakes.
Low-level concern	Any concern that an adult working with children may have acted in a way that is inconsistent with the staff code of conduct, including behaviour that may not meet the harm threshold but still requires recording and review.