Safeguarding and Prevent Policy

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Learning & Enterprise College Bexley

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1.0 Policy Statement

The Learning & Enterprise College Bexley (LECB) is committed to maintaining a safe environment for all staff and learners, taking prompt action whenever harm is suspected or disclosed. All allegations of abuse or significant harm will be reported to the appropriate social services, and the College will fully cooperate with investigations, whether concerns are recent or historic.

LECB has a duty to protect young people and vulnerable adults - defined as those aged 18 or over with care and support needs who are unable to protect themselves from harm. This policy applies to all staff, contractors, volunteers and learners across all College sites and off-site provision.

The College works closely with local safeguarding boards to monitor emerging risks and ensure appropriate measures are in place. All staff and volunteers must familiarise themselves with this policy and complete mandatory safeguarding training.

Prevent, the national counter-terrorism strategy, aims to stop individuals from being drawn into terrorism by addressing risks of radicalisation. Colleges must identify and support those at risk. Extremism includes vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance.

Radicalisation is the process through which someone comes to support terrorism or extremist ideologies. Concerns about radicalisation or extremism should be raised using the same procedures as all other safeguarding issues.

2.0 Relevant Legislation and Guidance

This Policy and Procedure has been developed in accordance with and guided by the following documents.

Core Safeguarding Legislation & Statutory Guidance

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (September 2025)
- Working Together to Safeguard Children (December 2023)
- Children Acts 1989 and 2004
- Children and Families Act 2014
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018
- Online Safety Act 2023 and the Protection of Children Code of Practice (2025)
- Guidance for Safer Working Practice (Safer Recruitment Consortium)

Prevent, Counter-Terrorism & Extremism

- Prevent Duty Guidance: for England and Wales (2023)
- Counter-Terrorism and Security Act 2015
- Counter Terrorism Local Profile (CTLP) 2024

Wider Safeguarding Risks & Vulnerability

- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- The Modern-Day Slavery Act 2015
- London Multi-Agency Adult Safeguarding Policy and Procedures (April 2019)

Education-Specific Requirements

- Education Act (2011)
- Education Act 2002 – Section 175
- SEND Code of Practice: 0 to 25 years
- Ofsted Education Inspection Framework (November 2025)
- Apprenticeships, Skills, Children and Learning Act 2009

Equality, Rights & Inclusion

- Equality Act 2010
- Human Rights Act 1998

Local Safeguarding Partnerships

- Bexley Safeguarding Partnership for Children and Young People
- Bexley Safeguarding Adults Board (BSAB)

3.0 Key Definitions (Working together to Safeguard Children DfE 2023)

Safeguarding and promoting the welfare of children

- providing help and support as soon as problems emerge
- protecting children from maltreatment, including online harm
- preventing impairment of health or development
- ensuring children grow up with safe and effective care
- taking action to ensure all children have the best life chances

Child Protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Adult at Risk

A person aged 18 or over who:

- has care and support needs
- is experiencing or at risk of abuse or neglect
- is unable to protect themselves because of those needs

Adult Safeguarding

means protecting a person's right to live in safety, free from abuse and neglect.

Advocacy

Taking action to help people who struggle to contribute to safeguarding processes, enabling them to express their wishes, secure rights, and access necessary services.

Best Interest

Under the Mental Capacity Act 2005, if a person lacks capacity, any decision made on their behalf must be in their best interest.

Concern

A term used when there is or may be an incident of abuse or neglect (replaces the previous term "alert").

Enquiry

An investigation to determine whether action is needed to prevent or stop abuse or neglect, and what action should be taken and by whom.

Making Safeguarding Personal

A person-centred, outcome-focused approach that ensures safeguarding work is meaningful to the individual concerned.

Organisational Abuse

Mistreatment or neglect within a care setting or service that violates dignity and shows lack of respect for human rights.

Person/Organisation Alleged to Have Caused Harm

The individual or organisation suspected of being the source of risk to an adult at risk.

Vital Interest

A term in Data Protection legislation permitting information-sharing where it is critical to prevent serious harm, distress, or life-threatening situations.

Early Help

Support provided as soon as a problem emerges, at any point in a child's life, to reduce escalation and ensure needs are met early.

Abuse, Neglect and Exploitation

Collective term encompassing physical, emotional and sexual abuse; neglect; and exploitation including child criminal exploitation (CCE) and child sexual exploitation (CSE).

Online Harms

Risks children face online, including harmful content, contact, conduct and commerce; expanded to include misinformation, disinformation and conspiracy theories.

Filtering and Monitoring

Technical and procedural measures used by education providers to protect children online by filtering harmful content, monitoring online activity, and maintaining appropriate cyber security. Procedures to be reviewed annually.

Children Absent or Missing from Education

Absence from education (not only 'missing') may indicate safeguarding concerns including risk of sexual abuse, criminal exploitation or neglect.

Alternative Provision

Education arranged for children unable to attend mainstream settings; the placing school/college retains safeguarding responsibility for the learner.

Harmful Sexual Behaviour (HSB)

Sexual behaviours expressed by children or young people that are inappropriate, abusive, harmful or exploitative, including online behaviours.

Sharing Nudes and Semi-Nudes

Responding to incidents where children share nude or semi-nude images of themselves or others, following the latest DfE guidance.

4.0 Responsibility for the Policy

The Lead Person for Safeguarding and Prevent in the College with overall responsibility for the policy is the Principal.

The Principal will act as the Designated Safeguarding Lead (DSL) for the college and will be responsible for updating the policy annually (or more frequently if legislative or regulatory changes prompt an earlier review) and providing an annual report to Senior Leadership Team (SLT) on its implementation.

The DSL is responsible for overseeing and managing referrals, training and raising staff and learner awareness, overseeing safe recruitment, and the health & safety and training aspects of the policy. They are also responsible for maintaining contacts with the Local Safeguarding Boards, the Department for Education's Regional Prevent Co-Ordinator and other agencies.

In addition to the DSL deputy DSL (DDSL) and 4 Safeguarding Officers for each Curriculum area who make up the safeguarding team.

Designated Safeguarding Lead	Principal
Designated Deputy Safeguarding Lead	Learner Support Manager
Safeguarding Officers:	CQM – Community Learning
	CQM – Essential Skills
	CQM – SEND
	CQM – Vocational Studies

The safeguarding team receive enhanced safeguarding and prevent training to enable them to fully understand and discharge the responsibilities of their roles.

The safeguarding team are the first point of contact for staff or learners with concerns. Contact details for these staff are included in learner handbooks and displayed prominently in the college centres, along with the college safeguarding email address (safeguarding@lecb.ac.uk).

In the absence of the DSL, the Learner Support Manager will deputise as the Safeguarding Lead for the College.

The DSL is responsible for overseeing the maintenance of central registers of safeguarding incidents/concerns and details of vulnerable learners.

The DSL is responsible for ensuring that all staff and volunteers in the College have received appropriate initial and refresher training and for keeping records of attendance at training events or completion of online training.

Members of staff must also take personal responsibility for ensuring they are appropriately trained, that they fulfil their referral and reporting obligations under this policy and that this policy is disseminated and implemented consistently throughout the College.

5.0 Learners' Safety and Well-Being

Everyone who has responsibility for learners must take steps to promote their well-being and safety.

The potential risk to learners is very broad. A list of some of them is given in *Appendix 1*. Tutors should be aware of these risks and be alert to the possibility that some of their learners may be experiencing some of these problems.

Learners with vulnerabilities

The College recognises that the circumstances of specific categories of learners render them particularly vulnerable to certain types of abuse. Safeguarding procedures are customised in these instances, to address these vulnerabilities designated staff are available to offer support.

These categories include:

- Learners with Special Educational Needs and Disabilities (SEND)
- Looked After Children (LACs) / Young Care Leavers (YCLs)
- Learners on English for Speakers of Other Languages (ESOL) courses
- Adults at risk

Children and adults with SEND are subject to additional safeguarding challenges as they may have difficulties with communication, are at higher risk of peer group isolation and may be disproportionately affected by bullying. College staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

The College aims to provide a supportive environment which encourages learners to speak out about any problems they may have, whether or not they are connected with their study, and will work with the learner to resolve these problems wherever possible.

The College aims to provide all its learners with the information they need in order to keep themselves safe, through their curriculum teaching and through dissemination of information via noticeboards, Learner Messenger, Learner Handbook and on-line resources.

6.0 The Prevent Duty

The College understands its responsibilities under the Prevent Duty and recognises that extremism and exposure to extremist materials and influences are safeguarding concerns.

The College is aware of the Counter Terrorism Local Profile and the most up to date information for 2024 is stored on the College's Safeguarding CPOMS system.

The College will respond to the ideological challenge of terrorism and aspects of extremism and the threat it faces from those who promote such views.

The College aims to provide practical help to prevent people from being radicalised and ensure that they are given appropriate advice and support.

The College will maintain relationships and contact with external agencies to ensure that current levels of risk are known and responded to accordingly.

The College will regularly review and update the Prevent Risk Assessment and Action Plan to ensure that all current local, national and international risks are managed.

See *Appendix 3* for further guidance and *Appendix 4* for flowchart for reporting concerns.

7.0 DBS Policy and Safer Recruitment of Staff

All College staff undergo a Disclosure & Barring Service (DBS) check prior to employment, in accordance with the terms of LA HR guidance and College employment contracts.

This covers full time, part time and sessional staff, whether permanent, fixed term or temporary, unless they are engaged for fewer than 4 weeks and are an appointed professional discharging their statutory duty.

Any contractor or volunteer who has or is likely to have unsupervised access to learners under the age of 18 or vulnerable adults will be subject to DBS checking.

Where a concern is raised via the DBS check or the barred list, the appropriate Manager would meet with the individual to discuss concerns and take statements. Following the meeting, the Principal will make a final decision. Any appeals will be sent to the Head of Service.

Any member of staff for whom the results of a DBS check are not known when they start employment will be subject to a specific risk assessment prepared by the recruiting/line manager and reviewed by the DSL. The risk assessment will identify appropriate actions to mitigate the risks, such as providing additional supervision and unannounced observations on the staff member. In some cases, it might be appropriate to determine that the staff member is not permitted to be alone with the following learners or groups of learners:

- Classes or groups specifically for children or young people under 18
- Classes or groups specifically for vulnerable adults
- Individual children or young people under 18
- Individual adults who may be vulnerable

Re-checks will be carried out when staff apply for a new position within the College, or every three years, whichever is the sooner. However, all teaching and support staff and those working directly with vulnerable learners should be signed up for the update service, following LA HR guidance.

Safer recruitment procedures are followed by the College, with all staff involved in chairing recruitment panels undergoing specific training in 'Safer Recruitment.' Job adverts and job

descriptions all state that before employment, a DBS check will be required as well as two written references. Offers of employment will only be conditional until satisfactory checks and references have been obtained. In addition, steps will be taken to ensure that all shortlisted candidates provide a career history, and satisfactory explanations are received and corroborated as necessary, to explain any career gaps.

A Single Central Record (SCR) of staff will be maintained by HR at the Council in line with statutory guidance within Keeping Children Safe in Education September 2024. The DSL will routinely review and report concerns to the Principal/Head of Service. The Deputy Director for Education, and member of the Governing Board meets termly with the DSL to review the SCR.

8.0 Staff Training and Code of Conduct

All staff and, where appropriate, contractors and volunteers, must be trained in the principles and practice of safeguarding. The training is designed to give staff information on:

The principles of safeguarding

- What we are safeguarding against; the signs of abuse
- How to deal with possible situations
- How to deal with the issue of confidentiality
- How safeguarding is embedded throughout the organisation
- Safer recruitment
- The Prevent Duty

Contractors and visitors on site will receive a visitors' guide detailing safeguarding and details are printed onto ID badges.

Mandatory on-line Safeguarding and Prevent training is for all staff and is emailed to staff pre-employment. HR monitor this as part of the induction process. Staff are required to complete by end of first week of employment if not done pre-employment.

DSL training is compulsory for staff with specialist responsibilities under this Policy, or who are involved in policy development.

All staff are expected to understand and adhere to the Staff Code of Conduct, which sets out rules for behaviour towards learners. Staff receive a copy as part of the induction process (*Appendix 8*).

9.0 Risk Assessments

If any member of staff becomes aware or is concerned that a learner who is enrolling or already attending College may have been involved in sexual or violent offences, they should report this to the DSL. The DSL will investigate the circumstances surrounding the offences and any subsequent convictions and then liaise with the Principal/Head of Service about the actions to be taken. The

College recognises its responsibilities under the Rehabilitation of Offenders Act but will always assess the risk to other learners before making a decision.

The risk assessment will aim to identify all the risks, assess their likelihood and impact in each case and devise strategies to mitigate them.

10.0 Information, Advice & Guidance for Learners

The learner Code of Conduct forms part of the learner induction process.

In addition to Safeguarding and Prevent, the learners' induction programme covers the College's Code of Conduct and how to keep themselves safe.

Safeguarding and Prevent is incorporated into the college's system for observations of teaching, learning and assessment.

Information for learners giving contact details for advice on all aspects of abuse and personal safety, including both college and external resources is available within college, on the website and Learner Messenger.

The College's ICT Acceptable Use Policy contains advice and rules for both staff and learners, which aim to minimise the risk of cyber-bullying, on-line financial deception and other on-line threats such as Prevent concerns. LECB will endeavour to both filter and monitor all internet usage within the College in a responsible and transparent way in order to ensure and maintain the safety of staff and learners.

A Health & Safety and Safeguarding risk assessment will be completed for learners on work placements/off site visits and reviewed by the relevant Curriculum & Quality Manager. Cases causing concern will be raised with the DSL and followed up as necessary.

11.0 Reporting Suspected Abuse

Any person working in the college (staff, contractors and volunteers), who has a reasonable suspicion that any other person is currently being abused, must report it as soon as possible to the DSL. If the allegation concerns a senior manager, then the concern should be raised with the Principal/Head of Service and if the allegation concerns the Principal/Head of Service personally, it should be made to the Head of Service, who will be able to request advice from external sources as necessary.

Any allegations made directly to HR will be reported to the College's DSL.

All staff, contractors and volunteers must understand their responsibility to be alert to the signs of possible abuse (*Appendix 2*). If anyone working in the college recognises signs of possible abuse in any other person, they should raise the concern with the DSL at the earliest opportunity, either by phone or by e-mailing the safeguarding e-mail. Serious concerns or where there is a perceived risk of immediate harm to the individual should be reported directly to the DSL, in their absence a senior manager and/or the Police. LECB acknowledges that taking action in cases of abuse is never easy.

If a young person or vulnerable adult makes a disclosure of abuse to a member of staff, they should follow the procedures in *Appendix 4* and

- Reassure the person concerned.
- Listen to what they are saying carefully.
- Record what you have been told/witnessed as soon as possible, including time, date, and place.
- Remain calm and do not show shock or disbelief.
- Tell them that the information will be treated seriously.
- Don't start to investigate or ask detailed or probing questions.
- Do not examine physical injuries.
- Do not judge, even if the allegation is against a colleague.
- Don't promise to keep it a secret but be clear that you will act sensitively and explain what will happen next.
- Contact a member of the Safeguarding Team as soon as is reasonably possible.

If a learner discloses historic abuse which has been disclosed previously, the College will treat the situation delicately and signpost the learner to support agencies if they are not already accessing them.

If an allegation of abuse is made against another learner, the process will be the same, the DSL will decide whether to invoke the Learner Disciplinary Policy against the alleged abuser.

If an allegation of abuse is made against a member of staff or volunteer, the DSL or other designated persons will liaise with the appropriate service areas within the local authority and to ensure that the Colleges' disciplinary procedures are coordinated with HR and any other enquiries taking place as part of the ongoing management of the allegation.

If a crime has been witnessed the police should be contacted immediately.

The safety of the individual(s) concerned is paramount. Consideration will be given to assess the level of risk to the adult all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The local authority has a whistle blowing policy, staff should all be aware and supported on how to use it.

12.0 Record Keeping and Data Protection

Staff can play a vital role in helping a young person or vulnerable adult in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a young person or vulnerable

adult that gives cause for concern should be reported to the DSL as soon as possible. It is important that records are factual and reflect the words used by the young person or vulnerable adult. It is important to remember that all issues are confidential, and staff should know only on a 'need to know' basis.

Reporting of a concern is completed via CPOMS safeguarding software which is used for monitoring safeguarding wellbeing and all pastoral issues.

In the event of a CPOMS failure, a Safeguarding Cause for Concern form can be found on the All Staff SharePoint. A copy is included in *Appendix 5*. The following information will need to be collected:

- Name of person of concern and date of birth.
- The incident(s), which gives rise for concern with date(s) and times(s).
- A verbatim record (as far as practical) of what the person of concern has said.
- If recording bruising/injuries indicate position, colour, size, shape and record the time.
- Action taken.

These basic details are vital to the information gathering process and do not constitute an investigation. Written information should be kept secure at all times and forwarded by email to the Safeguarding Team as soon as possible.

The DSL/DDSL will keep and store securely on Safeguarding SharePoint:

- a confidential central register of safeguarding incidents/concerns.
- a confidential formal record of all investigations into suspected abuse.
- a confidential file of safeguarding risk assessments.
- a confidential list of vulnerable learner.

Allegations against staff are filed under Secure Documents on the secure Safeguarding SharePoint site to which only the Lead DSL and the Principal and Vice Principal have access.

In the interests of all parties, it is important to resolve cases as quickly as possible whilst ensuring a consistent, fair and thorough investigation.

Interpretation of this policy shall be made by the Principal, the Governing Board lead for Safeguarding or the Lead DSL if required. Any challenges to the policy by learners or staff will be considered by the Principal who will respond to the challenge.

Safeguarding records will be retained until for 7 years after the year of leaving or until their 25th birthday (which is 7 years after the age when young people need to be engaged in education or training in England) whichever is longer for learners to allow learners to come back to college to re-trace their story and understand what happened to them at college.

This should be noted that in safeguarding cases a learner or staff member's right to be forgotten or objection to processing of their data under GDPR is limited. It is unlikely that they can "force" college to delete such data as the college can justify our retaining it.

Council HR must keep a Single Central Record of all required pre-employment checks completed; the DSL will routinely review this and should be checked annually by the Principal/Head of Service.

Under the College's Data Protection Policy, personal data must not be passed to anyone outside the College without their permission, with the exception of:

- funding bodies, for their prescribed purposes,
- the Police, where a crime has been or is likely to be committed
- the immediate welfare or safety of a person is at risk
- Department for Education (DfE)
- Department for Business, Innovation, and skills (BIS)
- Ofsted
- National Careers Service (NCS)

The MIS and Data Security Supervisor is the College's Data Protection Officer and can provide further advice.

No member of staff should disclose the whereabouts, or even the presence in the building, of a learner, to anyone, even someone claiming to be their relative or friend.

13.0 Subcontracted Provision

Where the College carries out subcontracted provision on behalf of another provider, it must ensure that any safeguarding concerns about the provider's learners are raised immediately with their DSL. This is particularly important in the case of provision for learners of statutory school age, referred to us by their school.

14.0 External Agencies

The DSL is responsible for maintaining contact with the Bexley Safeguarding Children Board and Adults Board and other local agencies and for determining whether and when a referral is appropriate or necessary. This collaboration is intended to ensure that support is made available to those who need it and that assistance and advice are available to the College where necessary.

Colleges have a legal duty to refer to the DBS, any member of staff who has harmed, or poses a risk of harm, to a vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been dismissed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or dismissal of the

individual. The College will abide this statutory requirement and will refer any such instances to the DBS without further reference to the individual.

Local support contact details for safeguarding and prevent concerns are listed in *Appendix 7*.

15.0 External Speakers/Visitors

For the College to effectively filter inappropriate guests/external speakers, staff must follow the External Speaker Policy and Procedure (*Appendix 6*).

The process will allow for the designated staff responsible for them seek permission in advance of any planned event.

An External Speaker Consent Form is the mechanism to notify the college of an intended attendee. This notification should be submitted to the DSL at least 10 working days prior to the event. If the individual is considered to pose any potential for controversy, a similar notification would be submitted to London borough of Bexley and the Metropolitan Police Service at least 5 working days before the event. This is to allow sufficient time for the respective agencies to consider the information received and supply appropriate feedback.

16.0 Implementation, monitoring, reviewing and evaluation

This policy will be reviewed annually or as required in accordance with new legislation and guidance.

The scope of this Safeguarding & Prevent Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures, and this policy should read alongside the following policies and protocols:

- Disclosure & Barring Service (DBS) Policy Procedure.
- Staff Recruitment & Selection.
- Volunteer Policy.
- Employee Grievance Policy & Procedure.
- Employee Disciplinary & Procedure Code of Conduct for Staff.
- HR Induction.
- Bullying & Harassment Policy.
- Whistleblowing Policy & Procedure.
- Health & Safety Policy.
- ICT Acceptable Use.
- Online Safety Policy.
- Data Protection Policy.

- Student Disciplinary Policy & Code of Conduct.
- Multi Faith/ Reflection Room Protocol.
- Duty Manager Role and Responsibilities.

17.0 Safeguarding & Prevent Team

The Safeguarding and Prevent team will be responsible for:

- Developing policy, protocols and good practice related to Safeguarding and Prevent.
- Facilitating an annual audit of practice.
- Approval of an annual report to be submitted to SLT.
- Review training, briefing, induction and key communications related to Safeguarding and Prevent.

APPENDIX 1: Potential Risks to Learners

The following are some specific safeguarding and prevent issues that we are required to protect learners from:

Safeguarding

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- peer-on-peer abuse, such as sexual violence and sexual harassment
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- serious violent crime
- hate crime
- risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'
- teenage relationship abuse
- upskirting
- substance misuse
- domestic abuse
- female genital mutilation forced marriage
- fabricated or induced illness
- poor parenting
- homelessness
- so called honour-based violence
- other issues not listed here but that pose a risk to children, learners and vulnerable adults

Other safeguarding issues may become apparent through:

Risky Behaviour

- Drugs and alcohol
- Self-harm

Financial abuse

- On-line fraud, e.g. phishing
- Door-to-door sellers
- Internet scams

Prevent

Some learners may appear to be at risk or susceptible to radicalisation into terrorism without showing a clear ideology. Individuals increasingly adopt a mix of ideas from different ideologies into their grievance narratives.

- This could include individuals who:
- show an interest in multiple extremist ideologies at the same time
- switch from one ideology to another over time
- target a 'perceived other' of some kind (perhaps based on gender or another protected characteristic), but do not otherwise identify with one particular terrorist ideology or cause - for example, involuntary celibates (incels) who direct their anger mainly at women
- are obsessed with massacre, or extreme or mass violence, without specifically targeting a particular group - for example, high school shootings
- show an interest in conspiracy theories which can act as gateway to radicalised thinking, common themes include:
    - religious or ethnic superiority
    - antisemitism
    - misogyny
- anti-establishment and anti-LGBT grievances
- may be susceptible to being drawn into terrorism out of a sense of duty, or a desire for belonging, rather than out of any strongly held beliefs
- radicalisation and/or extremist behaviour
- issues that may be specific to a local area or population, for example gang activity, youth violence, cuckooing

APPENDIX 2: Abuse, Neglect and Exploitation

The Department for Education publication "Keeping Children Safe in Education" published in April 2015 and last revised in September 2025 identifies four core categories of child abuse, plus key specific safeguarding concerns all staff must remain alert to.

Four core categories of child abuse

Abuse (General Definition)

A form of maltreatment where harm is inflicted or not prevented. Abuse can occur in families, institutions, communities, or online, and can be perpetrated by adults or other children.

Physical abuse

Involves causing physical harm to a child. This may include hitting, shaking, throwing, poisoning, burning/scalding, drowning, suffocating, or otherwise injuring a child or vulnerable adult. It also includes fabricated or induced illness.

Emotional abuse

The persistent maltreatment of a child that affects emotional development. It may include making a child feel worthless or unloved, silencing them, setting unrealistic expectations, exposing them to ill-treatment of others, or serious bullying including cyberbullying.

Sexual abuse

Involves forcing or enticing a child into sexual activities, whether contact or non-contact. Contact includes penetration or touching; non-contact includes showing sexual images, encouraging inappropriate behaviour, or grooming. Online sexual abuse is also included.

Neglect

The persistent failure to meet a child's basic physical or emotional needs, including adequate food, shelter, clothing, supervision, and medical care. It may also involve lack of emotional responsiveness.

Other Key Safeguarding Issues in KCSIE 2025

Child on child abuse

Children can abuse other children. This includes physical, emotional, and sexual abuse; harmful sexual behaviour; sexual harassment; and exploitation. Staff must not dismiss this as "banter" or "growing up."

Teenage Relationship Abuse:

Young people may experience coercion, control, physical, emotional, financial or sexual abuse within their intimate relationships.

Child Criminal Exploitation (CCE):

Children may be manipulated or coerced into criminal activity such as county lines, drug transport, violence, or theft.

Child Sexual Exploitation (CSE)

A form of sexual abuse involving power imbalance, where a child is manipulated or coerced into sexual activity in exchange for something they need/want, or for the perpetrator's gain.

Domestic Abuse

Children may witness or experience domestic abuse, and vulnerable adults may be subject to it. This includes psychological, physical, sexual, emotional or financial abuse between family members or intimate partners.

Female Genital Mutilation (FGM)

Female genital mutilation is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. Teachers have a statutory duty to report known cases involving girls under 18 to the police.

FGM is also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It's illegal in the UK and is child abuse. (NHS.uk 2020)

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a tutor, in the course of their work in the profession, discovers that an act of FGM appears to have been conducted on a girl under the age of 18, the tutor must report this to the police.

Signs of Possible Abuse

There are other ways of categorising abuse and a huge degree of overlap between the different types. Some signs of abuse can be caused by any or all of these. Abuse can be in person, or it can be through another medium, e.g. online.

There are many different signs of abuse. Examples which could cause concerns of current abuse are:

- Unexplained injuries
- Sudden changes in behaviour
- Concerning comments
- Inappropriate sexualised behaviour
- Deterioration in wellbeing

However, none of these signs are conclusive proof of current abuse. Any of these examples may be caused by historical abuse or a variety of other reasons.

Adults at Risk (Relevant in FE Settings)

Adults at risk (aged 18+ with care and support needs who may be unable to protect themselves) may experience a wide range of abuse.

Physical Abuse

This can include being assaulted, hit, slapped, pushed, restrained, being denied food or water, not being helped to go to the bathroom and misuse of medication.

Sexual Abuse

This includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that the person does not agree to or were pressured into consenting to.

Psychological Abuse

This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

Domestic abuse

This is typically an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is, or has been, an intimate partner or family member.

Discriminatory abuse

This includes some forms of harassment, slurs or unfair treatment because of, race, sex, gender and gender identity, age, disability, sexual orientation, religion, being married or in a civil partnership, being pregnant or on maternity leave

Financial Abuse

This includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits. Internet scams and doorstep crime are also common forms of financial abuse.

Neglect

This includes not being provided with enough food or the right kind of food or not being taken proper care of. Leaving the person without help to wash or change dirty or wet clothes, not getting them to a doctor when one is needed or not making sure that they have the right medicines.

Self-Neglect

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Organisational Abuse

Mistreatment, poor or neglectful care within an institution or care setting, often involving routines or practices that violate dignity and rights.

APPENDIX 3: Prevent

Prevent (the national programme)

Prevent is part of the government's counterterrorism strategy and aims to stop people from being drawn into terrorism. It focuses on identifying those at risk of radicalisation and providing support early.

Prevent also requires settings such as colleges to:

- Address risks of radicalisation
- Provide support to those who may be vulnerable
- Work with local and national partners to manage emerging risks

Extremism

Extremism includes vocal or active opposition to fundamental British values, such as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of different faiths and beliefs

It is considered a Prevent-related safeguarding risk when individuals show sympathies with extremist ideologies or groups or are influenced by extremist content or individuals.

Radicalisation

Radicalisation is **the process through which someone comes to support terrorism or extremist ideologies**.

Staff must report concerns where a person shows signs of:

- Growing extremist views
- Increasingly harmful, divisive or intolerant beliefs
- Obsession with extremist narratives or conspiracy theories (identified in the Prevent risk indicators)

Terrorism

While your policy does not detail a standalone definition, Prevent is part of the Counter-Terrorism and Security Act 2015, and terrorism is broadly understood as action intended to:

- Influence the government or intimidate the public

- Be carried out for a political, religious, racial or ideological cause
- Involve serious violence, damage, risk to life, or disruption
  (This aligns with Prevent and Channel operational definitions.)

Vulnerability to Radicalisation

Individuals may be at higher risk if they:

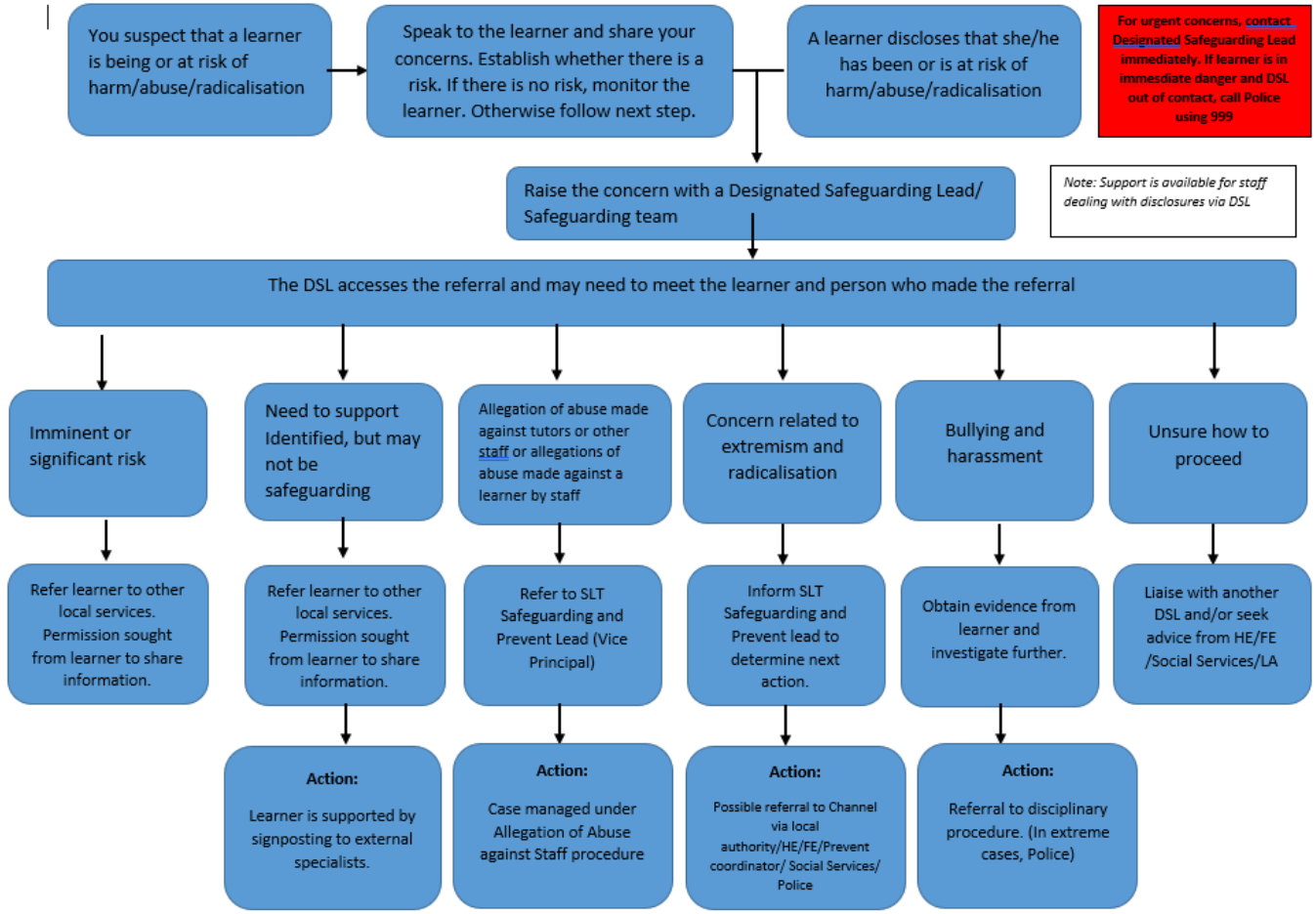
- Show interest in multiple extremist ideologies
- Switch ideologies over time
- Engage heavily with conspiracy theories
- Display grievances based on protected characteristics or gender

The Prevent Duty (legal responsibility)

The College must:

- Identify and support those at risk of radicalisation
- Respond to the ideological challenge of extremism
- Maintain relationships with external Prevent agencies
- Review the Prevent Risk Assessment and Action Plan regularly

APPENDIX 4: Flowchart for Dealing with Suspected Abuse and/or Disclosures of Abuse



APPENDIX 5: Safeguarding Cause for Concern Form

Safeguarding Cause for Concern Form

To be used in the event the CPOMS system is unavailable.

This form must be completed on every occasion where there is a safeguarding cause for concern. Please email this concern to the Safeguarding team: safeguarding@lecb.ac.uk

Details of the person completing the form	
Name:	
Role:	
Phone Number:	
Email:	

Details of the person at risk					
Name:					
Date of birth:		Age:		Sex:	☐ M ☐ F
Course(s)					
Has the person been informed information will be shared?				☐ Yes	☐ No
Has a disability				☐ Yes	☐ No
Has an EHCP				☐ Yes	☐ No

Date of Concern:	
Brief factual outline of concern:	

Type of alleged abuse/neglect (tick all that apply)	☐ Physical ☐ Emotional ☐ Sexual ☐ Neglect	☐ Child-on-child ☐ Teenage relationship ☐ CCE ☐ CSE	☐ Psychological ☐ Organisational ☐ Discriminatory ☐ Domestic ☐ FGM ☐ Financial/Material ☐ Self-Neglect ☐ Modern Slavery
	☐ Extremism		

Date and time of this record:	

Safeguarding Out of Hours

If you have concerns out of normal working hours (Monday to Friday after 5pm and weekends), report concerns as follows:

Life threatening situation

- Ring for an ambulance and/or contact the police on 999 or 101 (non-emergency).

Non-life-threatening situation

- If you think a child, young person or vulnerable adult is being abused or mistreated or you have concerns about a child, young person or vulnerable adult's well-being you should call and speak to someone at one of the following numbers:

Service	Child/Adult	Contact Number
Multi-Agency Safeguarding Hub (MASH)	Children (Under 18)	020 8303 7171
Bexley's Adult Safeguarding Team	Adults	0208 303 7777 screeners@bexley.gov.uk

APPENDIX 6: External Speaker / Organisation Policy and Procedure

POLICY FOR ORGANISING EVENTS WITH EXTERNAL SPEAKERS

1. Introduction

Learning and Enterprise College Bexley (LECB) is committed to creating an environment where everyone is treated with dignity and respect and where diversity is valued. This policy outlines the procedures relating to events involving the use of external speakers regardless of who is organising these events. This applies, therefore, to those hiring our premises as well as our own employees.

It also details our approach to ensuring that we are protecting both staff and learners and the reputation of LECB whilst following the legislation that we're responsible for upholding. This policy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Adult Education Colleges, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism".

2. Objectives

- To provide an environment where freedom of expression and speech are protected whilst balanced with the need to ensure that our community is free from harm and that incitement to hatred is never acceptable.
- To provide a supportive, inclusive and safe space for learners
- To provide clearly defined and effective procedures to ensure that the law is upheld.
- To collaborate with others to reach sound, evidenced judgments about proposed external speakers ensuring that LECB can meet their legal obligations
- To encourage and provide a balance of opinion at any academic discussion or debate
- To communicate to all staff, volunteers, and visitors, that it is our mutual responsibility to comply with the safeguarding policy and that both LECB and the individual can be held liable if they contravene the law.
- To provide clear instructions for organising an event with external contribution

3. Freedom of speech and expression

3.1. Freedom of expression and speech are basic human rights that are protected by law. Freedom of speech and freedom of expression are not absolute freedoms but freedoms within the law. Universities and colleges have a history of being open to debate and

ideas, with learners actively involved in pushing the limits of freedom of expression. 'Academic freedom' is a term used to describe the law that allows for open and honest debate in an academic context.

3.2. However, we have a duty to ensure the safety and welfare of our staff, learners and communities. The freedom to express views needs to be balanced with the need to secure freedom from harm for learners and communities. We want all our events, activities and initiatives to be safe, without risk to LECB, and within the law.

3.3. If an external speaker or their topic of discussion has the potential to go against our conditions for a safe event, we are committed to working together with event organisers and in some cases, external speakers themselves, to make sure that we reach a judgement that is reasonable, informed and within the law.

4. External speakers and their responsibilities

4.1. An external speaker, guest speaker or visitor is used to describe any individual or organisation who is not a learner or staff member of LECB and who has been invited to speak to learners and/or staff, or delegates attending a conference or meeting in our sites. This includes any individual who is a learner or staff member from another institution. It also includes the main contact from any external venue hire client who is paying to use LECB facilities.

4.2. An event is any event, presentation, visit, activity or initiative organised by a learner group/society, individual or staff member that is being held on LECB premises or where LECB is being represented by a stand on non-College site e.g. at an exhibition, school event or fair. It includes events where external speakers are streamed live into an event, or a pre-recorded film is shown. It also includes activity being held on LECB premises but organized by external venue hire clients.

4.3. All speakers or visitors should be made aware by the person or group arranging the event (by referring visitors to this policy on the LECB website) that they have a responsibility to abide by the law including that they:

- Must not advocate or incite hatred, violence or call for the breaking of the law.
- Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts.
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony.
- Must be mindful of the risk of causing offence to or seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.
- Are not permitted to raise or gather funds for any external organisation or cause without express permission of LECB.

5. Guidance for LECB staff and learners organising an event with an external speaker or venue hire client

5.1. Curriculum and Quality Managers or the relevant support Service Manager must be informed of any events that involve external speakers through this procedure. No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in this policy. This includes advertisement through any social media platform.

5.2. LECB reserves the right to cancel, prohibit or delay any event with an external speaker if the policy is not followed or if health, safety and security criteria cannot be met.

5.3. Any room booking/ event organisation with an external speaker involved must be made no later than 14 days before the date of the event. This is to allow for the organiser to have made adequate safeguarding checks as well as allowing time for alterations to the event if necessary. Any request made outside of this timeframe will be rejected unless there are extreme extenuating circumstances.

5.4. The individual/group organising an external speaker should conduct brief research into the proposed speaker. If in doubt as to the suitability of a speaker, they should refer the decision to the Learner Support Manager. Reasons for doubt could be (but are not restricted to) the following:

- any person or group on/or linked to the UK Government list of proscribed terror organisations
- talks by organisations generally considered to be extremist; a speaker who is known to have spoken previously at another institution on a topic that has caused fear or intimidation of learners or staff; a speaker accepted in mainstream as being highly controversial; a link or links to any person or group that has been connected with any controversy of a negative or positive nature; a speaker who has significant profile and attracts a following that could create crowd control and health and safety issues; a speaker from a political party during an election purdah.

5.5. In the event of referral, one of the following decisions will be made:-

- To not permit the event with the external speaker to go ahead
- To not permit the external speaker to attend the event (if it is a wider event)
- To fully permit the event with the external speaker to go ahead unrestricted
- To permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk. These may include observation; independent filming; the inclusion of opportunities to debate or challenge the view being held

5.6. In making recommendations, a Curriculum and Quality Manager, or support Service Manager may consult on a wider basis with LECB 's Safeguarding Team and risk will be assessed on the following basis:

- The potential for any decision to limit freedom of speech
- The potential for the event going ahead to cause reputation risk to LECB
- The potential for the speaker's presence on site to cause fear or alarm to learners or members of staff and/or to give rise to breach of peace

5.7. The Request for Prior Approval for an External/ Guest Speaker (Appendix 1) should be completed and forwarded to the relevant Manager no later than 14 days before the planned event. The completed form should be forwarded to Business Hub for logging on the Central Record.

5.8. Managers are responsible for ensuring that their staff team and learners are aware of and support the policy.

6. Additional Guidance for Venue Hire Clients organising an event with external speakers

6.1. LECB reserves the right to cancel, prohibit or delay any venue hire booking with external speakers if the policy is not followed, requested information not produced or if health, safety and security criteria cannot be met.

6.2. If in doubt as to the suitability of speakers, the Learner Support Manager, should refer the decision to the Head of Service. Reasons may be as outlined in 5.4.

6.3. In the event of referral, one of the following decisions will be made:

- To not permit the event with the external speaker to go ahead
- To not permit the external speaker to attend the event (if it is a wider event)
- To fully permit the event with the external speaker to go ahead unrestricted
- To permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk. These may include observation; independent filming; the inclusion of opportunities to debate or challenge the view being held

Linked Policies

- Safeguarding and Prevent Adults, Children and Young Persons Policy and Procedure
- Health and Safety Policy

APPENDIX 7: Local support contact details for Safeguarding and Prevent concerns

Service	Information
Multi-Agency Safeguarding Hub (MASH)	Monday to Friday 9am to 5pm 020 3045 5440 and speak to a social worker. Out of Hours Duty service 020 8303 7777 or 020 8303 7171. Ask to speak to the Duty Worker.
Bexley's Adult Safeguarding Team	020 8303 7777 screeners@bexley.gov.uk
SHIELD Safeguarding Partnership for Children and Young People	Tel: 020 3045 4320 Email: shield@bexley.gov.uk
Clair McGarry Community Safety Co-Ordinator Prevent & CR MARAC London Borough of Bexley	Phone: 020 3045 3990 / 07815 708562 Clair.McGarry@bexley.gov.uk What is Prevent? Telephone 0800 011 3764 for the national police Prevent advice line or visit actearly.uk/contact. report possible terrorist or extremist activity to the Metropolitan police.
PC 5075SO Anthony Champion	Bexley Counter Terrorism PROTECT Officer Mobile: 07909 998434 E-mail: Anthony.Champion@met.pnn.police.uk Address: Bexleyheath Police Station, 2 Arnsberg Way, Bexleyheath, Kent DA7 4QS
Sgt Ben Clarke	ben.j.clarke@met.police.uk 07825 606736 SO15Mailbox-.LocalOpsSouthEastTeam1@met.police.uk
Jennie Fisher DfE FE/HE Regional Prevent Co-Ordinator for London	07880 469 588 jennie.fisher@education.gov.uk Prevent Radicalisation and Extremism by Acting Early
Maria Rumbol Community Safety Co-ordinator (Violence against Women and Girls (VAWG), Modern Slavery and Hate Crime)	Maria.Rumbol@bexley.gov.uk 020 3045 3739

APPENDIX 8: College Code of Conduct for Staff

https://bhive.bexley.gov.uk/how-do-i/tasks-and-guides/employee-code-of-conduct/

LBB staff access only.