

Safeguarding Children, Young People & Vulnerable Adults Policy



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1. POLICY STATEMENT

1.1 The National Extension College (NEC), fully recognises the contribution it can make to protect children and vulnerable adults and to support its students. The aim of this Policy is to safeguard and promote students' welfare and safety by fostering an honest, open, caring and supportive climate. This is underpinned by a culture of vigilance and a shared understanding that safeguarding is everyone's responsibility

1.2 The NEC's mission is to widen learning opportunities for students who want flexible delivery of excellent and innovative courses. NEC's system of flexible study combining tutor support at a

distance and online learning resources, makes studying more accessible to a wide range of potential students. NEC's students therefore include people of all ages, including young people less than 18 years of age.

1.3 NEC welcomes students who may be considered vulnerable. Included are Children in need (as defined under the Children Act 1989). These may include, but are not restricted to, students or potential students within these categories:

- 1.3.1 Children with a child protection plan
- 1.3.2 Looked after children (in the care of the local authority)
- 1.3.3 Previously looked after children
- 1.3.4 Children with special educational needs and disabilities (SEND)
- 1.3.5 Children who are young carers
- 1.3.6 Children at risk of criminal exploitation or serious violence
- 1.3.7 Children who frequently go missing or are at risk of being trafficked
- 1.3.8 Children in families facing domestic abuse, substance misuse, or mental health challenges
- 1.3.9 Children who are at risk of radicalisation or grooming
- 1.3.10 have a substantial reduction in physical or mental capacity due to advanced age or illness
- 1.3.11 have a physical or mental illness, chronic or otherwise, including an addiction to alcohol, drugs or other substances
- 1.3.11 receive personal care, nursing, or support to live independently in their own home, or a care home

1.4 This policy recognises that individuals not ordinarily considered vulnerable may become temporarily at risk in the home, school, or workplace due to circumstances such as domestic abuse, mental health challenges, bullying, or other situational stressors.

1.5 This Policy sets out:

- 1.5.1 the responsibilities of NEC staff in relation to the safeguarding of children, young people and vulnerable adults and the procedures which staff should follow when reporting concerns or allegations; and (as required under legislation).
- 1.5.2 NEC's responsibilities relating to staff who undertake regulated activity

2. APPLICABILITY OF THE POLICY AND LEGAL REQUIREMENTS

2.1 This Policy applies to those working at all levels and grades, including trustees, senior managers, employees, consultants, contractors, part-time and fixed term employees, casual and agency staff and volunteers. (All collectively referred to as 'staff' in this Policy).

2.2 This Policy specifically covers all those who work in a regulated activity with children and / or adults. This Policy defines a child as anyone under the age of 18 years.

2.3 This Policy is to be read in conjunction with all relevant NEC policies.

2.4 NEC ensures that statutory requirements regarding safeguarding are applied and followed.

This includes, but is not limited to:

- 2.4.1 All staff who work directly with children must read Part One and Annex B of the most recent version of Keeping Children Safe in Education (KCSIE)
- 2.4.2 The College's reporting structures for safeguarding concerns reflect those outlined in KCSIE
- 2.4.3 Trustees will ensure that the college is compliant with all duties under legislation and statutory guidance such as the most recent KCSIE. This includes making sure that policies, procedures, and training are effective

3. THE SCOPE OF SAFEGUARDING

3.1 NEC aims to ensure that:

- 3.1.1 staff acting on its behalf do not intentionally or unintentionally cause harm to others;
- 3.1.2 staff are vigilant and take appropriate action if they become aware that a student or any other individual is being harmed, such as a child in the student's care or educational setting they attend

3.2 Harm may include the following either singly or in combination:

- 3.2.1 sexual abuse
- 3.2.2 physical abuse
- 3.2.3 emotional abuse
- 3.2.4 neglect
- 3.2.5 sexual exploitation (including child sexual exploitation, or CSE)
- 3.2.6 Financial or material exploitation
- 3.2.7 Criminal exploitation (including 'county lines')
- 3.2.8 Bullying, including cyberbullying and online harassment
- 3.2.9 Honour-based abuse (including Female Genital Mutilation [FGM] and forced marriage)
- 3.2.10 Domestic abuse
- 3.2.11 Radicalisation and extremism

4. ROLES AND RESPONSIBILITIES

4.1 It is not the role of NEC or any of its staff to make a judgement as to whether abuse has occurred. This is the role of the statutory agencies and / or the police. All NEC staff do however, have a responsibility for reporting any suspicions or concerns of abuse and for ensuring that the child, young person, or vulnerable adult involved is being heard.

4.2 NEC promotes a culture of vigilance, where the safety of learners is a shared responsibility of all staff. All individuals engaging with learners, regardless of role, are expected to be alert to signs of harm, actively

contribute to a safe learning environment, and take appropriate action where concerns arise. Young people and vulnerable adults may have contact with many members of staff at NEC, for example:

- 4.2.1 administrative staff who carry out duties such as enrolment and student support
- 4.2.2 tutors and assessors
- 4.2.3 internal quality assurers, in situations such as contacting a student to ensure the quality of learning experiences
- 4.2.4 members of NEC's executive team in situations such as appeals against assessment decisions

4.3 NEC recognises its responsibilities to:

- 4.3.1 Have a named member or members of staff who can be contacted for advice, together with their contact details (please see Appendix 1).
- 4.3.2 Arrange Disclosure and Barring Service checks for staff who undertake regulated activity as defined by the Disclosure and Barring Service guidance (July 2013) and Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.
- 4.3.3 Never knowingly engage a barred person in a regulated activity by using robust recruitment procedures as set out in the NEC *Safer Recruitment Policy*.
- 4.3.4 Work closely with appropriate external agencies.
- 4.3.5 Have procedures in place for reporting suspicions or concerns.
- 4.3.6 Ensure staff understand their legal obligation and duty of care to raise any concerns they have about the safety or well-being of any child, young person, vulnerable adult or other individual with whom they come into contact in the course of their role with the NEC. This includes their obligation to identify children who may be at risk of radicalisation.
- 4.3.7 Ensure that staff understand that if they are unable to contact the relevant individuals at NEC, or if they believe that appropriate action is not being taken, they should report their concerns directly to Children's Social Care (for children), Adult Social Care (for adults) or the Police.
- 4.3.8 Respect confidentiality but recognise that safeguarding concerns override confidentiality on a 'need to know' basis.
- 4.3.9 Keep securely all reports and records pertaining to safeguarding concerns.

4.4 Overview of the Designated Safeguarding Lead (DSL) Role

The Designated Safeguarding Lead (DSL) holds overall responsibility for safeguarding and child protection across the organisation. The DSL provides leadership, guidance, and coordination to ensure that all safeguarding concerns are responded to effectively and in a timely manner. The DSL's responsibilities include:

- 4.4.1 Acting as the primary point of contact for safeguarding concerns, including those raised by learners, staff, or external agencies.
- 4.4.2 Liaising with external safeguarding bodies such as the Local Authority Designated Officer (LADO), local social care teams, Prevent officers, the Police, and the NSPCC.

- 4.4.3 Ensuring safeguarding policies and procedures are implemented consistently across NEC and updated in line with statutory changes and best practice.
- 4.4.4 Maintaining secure, detailed records of safeguarding incidents and monitoring data to identify trends or areas of risk.
- 4.4.5 Reporting on safeguarding trends and emerging concerns to the senior leadership team and the Board.
- 4.4.6 Ensuring all NEC staff receive safeguarding training appropriate to their role, including at induction, regular updates, and annual refreshers. This includes ensuring that staff read and understand relevant sections of *Keeping Children Safe in Education* (KCSIE).
- 4.4.7 Supporting and advising staff involved in safeguarding cases, ensuring concerns are handled sensitively and appropriately.
- 4.4.8 Promoting a culture of vigilance across the organisation where safeguarding is recognised as everyone's responsibility.

The DSL may delegate activities to appropriately trained Deputy DSLs, but retains overall accountability for safeguarding practice and outcomes across the organisation.

5. MAINTAINING PROFESSIONAL BOUNDARIES AND CONDUCT

- 5.1** NEC staff must maintain clear and appropriate professional boundaries with all learners. Interactions — whether in person, by phone, email, or online — should be respectful, inclusive, and free from personal comments or humour that could be misinterpreted.
- 5.2** Staff should not share personal contact information with learners and must use only NEC-approved platforms and communication channels when working with or supporting learners.
- 5.3** Staff must not engage with learners or prospective learners through personal social media accounts. Any educational use of social media must be authorised and monitored by NEC.
- 5.4** All staff are expected to conduct themselves in a way that upholds NEC's values and supports a safe learning environment for all. Any concerns about staff conduct will be taken seriously and managed in line with the Safer Recruitment and Allegations Management Procedures.
- 5.5** If an allegation is made about a staff member that meets the threshold outlined in *Keeping Children Safe in Education* (KCSIE) Part 4, the Head of Centre will act as case manager, making initial enquiries and liaising with the Local Authority Designated Officer (LADO) and relevant authorities as required.

6. PROCEDURE FOR HANDLING SAFEGUARDING CONCERNS ABOUT STUDENTS (ALL COURSES)

6.1 When a tutor has a concern about the welfare of a student, they must report this concern.

6.2 If the concern arises from a piece of submitted work, telephone call or email, the tutor must report the concern to the NEC to log the report. NEC will duly assess the concern reported and decide whether to pass the information to the relevant Local Authority.

7. PROCEDURE FOR HANDLING SAFEGUARDING CONCERNS ABOUT A CHILD IN A SETTING

7.1 When a tutor has a concern about a child in an education setting, they must report this concern.

7.2 If the concern arises from a live tutorial, a piece of submitted work, a telephone call or an email, the tutor must:

7.2.1 advise the student to report the concern to the designated Safeguarding Officer in their education setting; and

7.2.2 report the concern to the NEC to log the report and pass the information to the relevant Local Authority.

7.3 If a NEC does not believe a concern has been appropriately followed up by the setting's nominated person, then NEC will contact the relevant Local Authority social care team.

7.4 All reports passed to the NEC will be logged and passed to the relevant Local Authority social care team within 48 hours.

8. IMPLEMENTATION, MONITORING AND REVIEW

8.1 The Chief Executive has responsibility for this Policy and for ensuring that:

8.1.2 appropriate procedures are in place and are implemented;

8.1.3 all NEC staff are aware of their duties under this Policy; and

8.1.4 any concerns and any action taken are reported to the Board.

8.2 The Board has overall responsibility for the operation of this Policy, ensuring that adequate resources are available for its effective implementation, and for monitoring and evaluating its implementation and impact.

8.3 This Policy will be reviewed annually and updated, as applicable, to ensure that it remains appropriate in the light of any relevant changes to the law, organisational policies or contractual obligations.

9. ONLINE SAFETY

The College's approach to online safety is covered fully in the NEC Online Safety Policy. It is based on the four key categories of risk as identified by KCSIE.

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, misinformation, disinformation ('fake news'), conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, and online bullying.

Commerce – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams

In addition, the college is committed to managing risks associated with Generative AI, and supports students to use AI responsibly.

10. DRUG AND SUBSTANCE MISUSE

10.1 If a tutor delivering online live seminars suspects that an NEC online student has taken a banned substance, they should report the matter to the DSL immediately.

10.2 The matter will be investigated by the Education and Quality Manager and the DSL.

10.3 The student and those involved in their care (where appropriate) will be informed.

11. PASTORAL CARE AND SAFEGUARDING

11.1 The Role of the Pastoral, Care Service in Safeguarding

The NEC Pastoral and Welfare Service is a key component of NEC's commitment to student welfare, providing an early intervention and support mechanism to help students manage personal and academic challenges before they escalate into safeguarding concerns.

This service acts as a proactive layer of safeguarding, ensuring that students - particularly those facing difficulties - receive appropriate support to prevent disengagement, distress, or further risk. By addressing study barriers, emotional well-being, and practical challenges, the service helps students remain engaged in their learning and reduces their vulnerability to harm.

The Pastoral Care Service provides structured support in the following areas:

- Study skills, motivation, and time management
- Mental health concerns such as anxiety, stress, or low confidence
- Difficulties linked to Special Educational Needs (SEN) or disabilities
- Personal challenges affecting learning engagement

The Pastoral Officer provides Stage 1 support by offering focused one-to-one sessions, with an escalation pathway to Stage 2 specialist support via NEC's external partner for students requiring in-depth professional intervention.

11.2 Pastoral Support as an Early Safeguarding Measure

While the Pastoral Care Service is not a safeguarding referral service, it plays a crucial role in:

- Identifying students at risk of disengagement, isolation, or distress.
- Identifying students who are persistently absent and recognising that this is a potential safeguarding concern.
- Recognising early signs of safeguarding concerns, including disclosures of harm, mental health crises, or vulnerabilities linked to abuse, neglect, or radicalization.
- Providing a safe space for students to discuss their challenges and seek support before concerns escalate.
- Referring safeguarding concerns to NEC's Designated Safeguarding Lead (DSL) or Deputy DSL, in line with NEC's safeguarding procedures.
- Involving parents/guardians where necessary for students under 18 or vulnerable adults.

All interactions remain confidential, and information is only shared when it is deemed necessary for the student's safety and well-being, following NEC's safeguarding and data protection policies.

11.3 Strengthening a Safe Learning Environment through Pastoral Support

The Pastoral Care Service works alongside NEC's safeguarding and student support teams to:

- Reduce safeguarding risks by proactively addressing student challenges.
- Provide tutors and NEC staff with a referral pathway for students needing additional non-safeguarding support.
- Help students navigate mental health concerns and academic pressures, ensuring they remain engaged in their learning.
- Act as a bridge between academic support and safeguarding, ensuring that students receive appropriate interventions at the right time.

11.4 Pastoral Care and Online Safety

As part of NEC's Online Safety and Safeguarding Strategy, the Pastoral Care Service:

- Supports students experiencing online-related stress or mental health concerns linked to cyberbullying, social isolation, or academic pressure.
- Encourages responsible online behaviour and digital resilience.
- Provides a space for students to raise concerns about online safety, with clear referral pathways to safeguarding leads.

Any safeguarding concerns identified through pastoral support must be logged and referred to the DSL or Deputy DSL, following NEC's safeguarding procedures.

12. WHISTLEBLOWING

NEC recognises that a proactive whistleblowing culture is a vital component of an effective safeguarding system. In line with the latest KCSIE policy, all staff, volunteers, and contractors are encouraged to raise genuine concerns regarding poor or unsafe practice, potential failures in our safeguarding provision, or the conduct of colleagues (including "low-level concerns") at the earliest opportunity.

We guarantee that any member of staff who raises a concern in good faith will be supported and protected from any form of victimisation or detriment, even if the concern proves to be unfounded. Concerns should normally be raised with the DSL. However, if a staff member feels unable to raise the issue internally, or believes their concerns have not been addressed, they are encouraged to contact external bodies such as the NSPCC Whistleblowing Advice Line or Ofsted. Our primary focus is the safety and well-being of the child; "doing nothing" is not an option.

13. RECORD RETENTION

Safeguarding records will be retained in line with statutory guidance and our organisation's **Data Protection and Retention of Records Policy**.

- Child protection records are retained until the individual reaches 25 years of age.
- Records of safeguarding allegations made against staff are retained until the individual reaches normal retirement age or for 10 years, whichever is longer.
- All records are stored securely and access is restricted to those with designated responsibility. Once the retention period expires, records will be disposed of securely.

14. DATA PROTECTION AND INFORMATION SHARING

The National Extension College (NEC) processes personal and special category data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

While NEC is committed to protecting the privacy of all students, tutors, and staff, the safety and welfare of a child or vulnerable adult is the primary consideration. UK GDPR and the Data Protection Act are not barriers to justified information sharing.

NEC will share information with relevant authorities (such as Local Authority Children's Social Care or the Police) without consent where it is necessary to:

- Protect the vital interests of an individual.
- Prevent a child or vulnerable adult from being at risk of significant harm.
- Prevent or detect a crime.

All information sharing will be necessary, proportionate, relevant, accurate, timely, and secure. NEC will maintain a clear record of what information has been shared, with whom, and the professional justification for doing so.

APPENDIX

Roles and responsibilities

DSL Sarah Turner - sarah.turner@nec.ac.uk 01223 400211

Deputy DSL - Alison Edwards: alison.edwards@nec.ac.uk 01223 400280

Deputy DSL - Louise Tolhurst: louise.tolhurst@nec.ac.uk 01223 400384

Deputy DSL - Esther Chesterman: esther.chesterman@nec.ac.uk 01223 400210

Those wanting to raise a safeguarding concern can also use the email address safeguarding@nec.ac.uk which is monitored by the safeguarding team only.

NSPCC

Students, tutors and NEC staff can contact the NSPCC at any time to discuss a concern, using the following contact details:

- Telephone / Text 0808 800 5000 / 88858
- Email help@nspcc.org.uk
- Online nspcc.org.uk/reportconcern