

Safeguarding Policy

Protecting every learner in our care

CoreEd Limited

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1. Introduction and Scope

CoreEd is committed to ensuring the protection, safety, and well-being of all learners, both children and adults at risk, whilst promoting a culture of openness and fairness for all. This policy applies to all staff, learners, contractors, and employers.

We will promote the policy and ensure that all staff, employers, and contractors adhere to and follow the same practices. We will promote the policy through ongoing discussions at team meetings, CPD training, learner reviews, online training sessions, assessments, and workplace visits.

This policy is delivered within the guidance of Working Together to Safeguard Children 2023 and Keeping Children Safe in Education (September 2024) legislative documents and will be updated accordingly.

We will promote and raise awareness of safeguarding throughout the organisation and ensure that staff are equipped with the appropriate skills and knowledge to support learners effectively to help keep them safe.

We will raise awareness of safeguarding amongst all our learners to ensure that they are equipped with the skills and knowledge needed to keep them safe, to recognise when they are at risk and how to get help when they need it.

We will follow the procedures for identifying and reporting safeguarding incidents or suspected/potential incidents as specified in this policy.

Relevant Legislation

This policy has been developed concerning, and to adhere to the statutory requirements within the following legislation:

Protection of Freedoms Act (2012)
Data Protection Act (2018) & The General Data Protection Regulation (GDPR) (2018)
Working Together to Safeguard Children (2023)
Children Act (1989) & (2004)
Children and Families Act (2014)
Keeping Young Children Safe in Education (September 2024)
Disclosure and Barring Service Code of Practice (November 2015)
Sexual Offences Act (2003)
Equality Act (2010) (including the Public Sector Equality Duty)
Counter-Terrorism and Security Act (2015)

Related CoreEd Policies

This policy should be read in conjunction with the following CoreEd policies:

- Safer Recruitment Policy
- Prevent Policy
- Health and Safety Policy
- Equality and Diversity Policy
- Staff Code of Conduct and Whistleblowing Procedure
- Data Protection Policy
- Online Safety Policy
- Remote Learning Policy

2. Staff Responsibilities

All staff are responsible for ensuring that they keep up to date with changes in government legislation. All staff must read and understand Part 1 of Keeping Children Safe in Education (September 2025) statutory guidance.

All staff must respond to any safeguarding concerns.

CoreEd has a Senior Designated Safeguarding Lead, who is the Head of Safeguarding and Welfare and will be supported with appropriate training and resources. The Safeguarding team will support the senior DSL.

All staff and learners will be aware of who the senior DSL is and how to contact them as part of induction. The awareness will be continuously reinforced through training sessions, learning materials, the website, and newsletters.

CoreEd will ensure that all staff are aware of and understand their responsibilities about safeguarding and being alert to the signs and indicators of abuse.

The DSL will ensure that effective safeguarding procedures are developed, implemented, and monitored to ensure their effectiveness. These procedures are based on the 5R's approach:

Recognise	Be alert to signs and indicators of abuse in all settings.
Respond	Respond calmly, listen, use open questions, do not probe.
Record	Write down exactly what was said, using the person's own words.
Report	Report immediately to the Designated Safeguarding Lead (DSL).
Refer	The DSL decides whether to refer to external agencies.

Recognise

The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on our premises or in the home or in any other setting in which the learner may find themselves, all those

playing a role in meeting the learner's needs should be aware and informed so that abuse can be recognised, investigated, and acted on seamlessly and effectively.

Signs and indicators of abuse in young or vulnerable learners may include disclosures. This is not always easy to recognise as such, as it may be that the learner is struggling to find the words, is using language the abuser uses for particular actions and body parts, or the disclosure is wrapped in analogy or euphemism which is difficult to identify. A learner may choose anyone in the organisation to disclose to, or it could be that any person within the organisation may spot concerning signs or behaviour in the learner. Other people in a position to identify concerns include work placement supervisors and other learners. All of these should be trained to understand signs of abuse and know how, where and to whom to report concerns. It is important that we have a culture where concerns can be raised and discussed, without worrying that they may get it wrong or that others will overreact.

Respond

Appropriate response is vital. No disclosure about abuse or neglect should ever be ignored. To determine the most appropriate response, find out if you are dealing with an allegation from a learner against a member of staff or a fellow learner, or another person outside of our organisation. Is this disclosure from an individual alleging abuse to themselves or to another person? Is it the reporting of a concern or suspicion? What, precisely, is alleged to have happened? Clearly understood detail is vital when reporting your concerns to a Designated Safeguarding Lead.

Do not lead or probe with questions. Remain calm and demonstrate interest and concern. Use empathetic listening skills and do not let the learner know if you are feeling panicked, shocked, or outraged at what you are hearing as this may shut them down. You need to ask open questions, not leading or suggestive ones and gather enough information to know that it is a disclosure of abuse that needs to be passed on, and how immediate the danger or harm is to the individual. It is not your role to get a detailed account, as the individual may have to recount their story numerous more times.

Inform the person disclosing to you that concerns they have raised must be recorded and passed on so that possible abuse can be dealt with, and that this will be done on a limited 'need to know' basis, with as few others as possible knowing the identity of the complainant. All in the chain of reporting will respect confidentiality.

Reassure the learner that they have done the right thing in reporting their concerns and that you will do everything you can to help. Do not make unrealistic promises. Ensure that testimony is passed on to the Designated Safeguarding Prevent Lead, so that they can record this in MyConcern, and that the complainant and subject of the complaint are treated in line with this policy.

Report

Report your concerns to the Designated Safeguarding Lead (DSL) in the first instance. If they are unavailable for any reason or are the subject of allegations, CoreEd's Company Director should be contacted, or their Deputy.

All Designated Safeguarding Leads (DSLs) have received training and support to ensure they conduct this role effectively.

During both staff and learner inductions, the Designated Safeguarding Leads (DSL) will be identified, and posters displayed in online learning materials and the learner handbook to inform learners.

Once you have reported concerns about abuse to the Designated Safeguarding Lead and appropriate action has been taken, it may not be necessary for the DSL to share details of this with you, for the confidentiality of the individual concerned.

Record

You should record precisely what has been alleged, using key phrases and words the individual has used. You are not expected to remember every detail of the conversation, and therefore it is not recommended that notes or any other recording is made during the conversation, but immediately afterwards. Doing so during the conversation can cause the learner to feel the formality this might bring, when they just need someone to listen at this first stage.

You should also record your factual observations about the physical and emotional state of the individual sharing their concerns with you. This record should be passed on to the Designated Safeguarding Lead (DSL) who will store it securely. This information will only be accessible to those who have responsibility for safeguarding matters.

Refer

This is not the responsibility of all staff members. It is the responsibility of the Designated Safeguarding Lead to investigate complaints, allegations or suspicions of abuse or neglect and decide on whether to make a referral, if appropriate.

Only the senior Designated Safeguarding Leads should make referrals outside of the organisation, to prevent numerous referrals being made for the same incident; it allows consistency in the process. Actions of this sort conducted by someone other than the DSL could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

Only the Company Director and the Senior Safeguarding Lead are authorised to refer staff cases to the Disclosure and Barring Service.

External Relationships

The DSL will ensure that effective links are developed with relevant external agencies and local Safeguarding Partners as appropriate for the geographical location of learners and cooperate with requirements that may arise from any safeguarding referrals. CoreEd delivers training nationally, therefore, when discharging our Safeguarding duties, we will consider the procedure and adhere to all Local Children's Safeguarding Partnership's processes and procedures.

The DSL will ensure that we keep written records of safeguarding concerns, even where there is no referral to a relevant agency. Records will be maintained on MyConcern where all records are stored securely and in line with the Data Protection Act (2018) and GDPR.

3. Safeguarding Overview

Safeguarding and promoting the welfare of children is defined by the Keeping Children Safe in Education (September 2025) Guidance as: protecting children from maltreatment; preventing impairment of young children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Safeguarding is embedded through a proactive and preventative approach to protect young and vulnerable learners from any potential harm or damage. CoreEd recognises that learners may be suffering harm or at risk of harm and will ensure that staff recognise the signs and how to respond. We will ensure that our Safeguarding commitment involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

CoreEd will consider the possibility of contextual safeguarding for learners by seeking to establish information about each learner. This information will be used to assess whether wider environmental factors are present in a young person's or adults at risk's life that could be a threat to their safety and/or welfare.

Learners will be placed on the MyConcern system using an appropriate RAG rating system where contextual safeguarding information is also made available.

CoreEd is committed to promoting safeguarding to:

- Enable learners to rely on those people in positions of trust.
- Ensure staff are protected from malicious and misplaced allegations.
- Ensure staff are clear about individual responsibilities, roles, and boundaries.
- Ensure learners are appropriately protected.
- Ensure all issues are dealt with effectively.

4. Defining a Child and Adult at Risk

A child is a learner who has not yet reached their 18th birthday (Children Act 2004).

An adult at risk is a learner aged 18 years or over, who might be in the care of, or in need of support for their mental health, a physical disability, or illness and unable to protect themselves against significant harm or exploitation.

All staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory Education and Health Care Plan).
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including serious violence, gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.
- Is gender questioning.

5. Supporting Learners

CoreEd recognises its duty and responsibility to track and monitor the achievement and progression of vulnerable groups. We know that these groups are less likely to achieve and that they may be more likely to be 'at risk' due to their vulnerability.

As part of the recruitment process, learners belonging to 'at risk' groups will be identified through the application process. The information will be held on SharePoint so that progress can be monitored. Appropriate interventions and support will be in place to ensure they are kept safe and achieve as well as other learners. The following list identifies learners as vulnerable:

- Minority Ethnic Group
- Special Education Needs / Disabled / Medical Condition (if learners have an Education and Health Care Plan, a copy MUST be obtained and placed on their personal file)
- Disadvantaged (Free School Meals)
- Asylum Seeker
- In Care
- Care Leaver
- Pregnant
- Teenage Parents
- ESOL
- LGBTQ+ (Lesbian, Gay, Bisexual, Transgender, Queer/Questioning)
- Ex-Offender / YOT
- Child Protection Plan / Attached to a Social Worker
- Young Carer
- Gypsy, Roma, or Traveller Background

Regulated Activity

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that time.

CoreEd delivers regulated activities through:

- Teaching, training, and assessment sessions both online and face-to-face.
- Provision of advice or guidance on physical, emotional, or educational well-being.

Employers and Safeguarding

CoreEd works with numerous organisations nationally and will ensure that all workplaces have appropriate health and safety and safeguarding policies and procedures in place.

CoreEd will require all employers to:

- Have a responsibility to cooperate with CoreEd to ensure that they offer a safe working environment for all learners, safeguard their welfare, and protect them from harm.
- Be aware of their responsibilities concerning protecting the safety and welfare of vulnerable learners.
- Be aware of the reporting procedures and know who to contact if they have concerns for the safety and well-being of the vulnerable individual.
- Have contact details for the Designated Safeguarding Lead to report concerns for the individual's safety and well-being.
- Keep accurate and up-to-date records of all concerns raised by learners.

6. Definitions and Types of Abuse, Neglect and Exploitation

'Child abuse and neglect' is a generic term encompassing all ill-treatment of young and vulnerable people, including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the person's health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable person. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young and vulnerable people may be abused in the family or an institutional or community setting by those known to them or by others such as via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Keeping Children Safe in Education (September 2025) sets out definitions and examples of the four broad categories of abuse, plus specific guidance for:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- Child on Child Abuse including bullying, sexual violence and sexual harassment
- Domestic Abuse
- Serious Violence
- Female Genital Mutilation
- Mental Health
- Online Safety & Risks

Physical Abuse

Physical abuse is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on their emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on them. It may involve seeing or hearing the ill-treatment of another, serious bullying (including cyber-bullying), or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may also include non-contact activities, such as involving them in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming a person in preparation for abuse (including via the internet). Adults do not solely perpetrate sexual abuse; young people can also commit acts of sexual abuse against another young person.

Neglect

The persistent failure to meet a young person's basic physical and/or psychological needs likely to result in the serious impairment of their health and/or development. Neglect may involve a parent or carer failing to provide

adequate food and clothing, shelter including exclusion from home and abandonment; failing to protect a person from physical and emotional harm or danger; failure to ensure adequate supervision; or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Child Criminal Exploitation (CCE)

CCE occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Abusers are increasingly using the internet to target vulnerable children. It can happen across any device that is connected to the web, like computers, consoles, tablets, mobile phones, and smart speakers. Young people can be at risk of online abuse from people they know or from strangers.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. Young people can become trapped by this type of exploitation as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives.

It is important to note that the experience of girls who are criminally exploited can be quite different to that of boys. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Child on Child Abuse including Bullying, Sexual Violence and Sexual Harassment

Safeguarding issues can manifest themselves via young peer-on-peer abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, to view their genitals or buttocks. It is a criminal offence.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Abuse in intimate personal relationships between peers.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).

When there is a concern raised regarding peer-on-peer abuse, staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff must understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter” or “boys being boys” can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and a single incident or a pattern of incidents. Abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Serious Violence

CoreEd recognises that learners can be at risk from or be involved with serious violent crime. All staff should be aware of associated risks and understand the measures in place to manage these and the DSL must know what action to take. Guidance is provided in the Home Office publications Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines.

So-called ‘Honour’-based Abuse (HBA) and Female Genital Mutilation (FGM)

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and breast ironing.

Any abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

All staff should speak to the DSL with regards to any concerns regarding female genital mutilation (FGM). There is a specific legal duty on teachers who must inform the police if they have concerns about FGM and a girl under the age of 18.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

When young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the safeguarding policy and speaking to the Designated Safeguarding Lead.

Online Safety & Risks

Young people must be safeguarded from potentially harmful and inappropriate online material. Online safety risks are ever evolving, but can be categorised into four areas of risk:

- Content – Being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact – Being subjected to harmful online interaction with other users; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them.
- Conduct – Online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, sharing other explicit images and online bullying.
- Commerce – Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Young people have unlimited and unrestricted access to the internet via mobile phone networks. It is imperative that all staff are vigilant and apply professional curiosity in identifying risks or signs of online abuse and deal with instances appropriately.

Children Who are Lesbian, Gay, Bisexual, or Gender Questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by others.

For learners at CoreEd who are questioning their gender and are under the age of 18, CoreEd recognises that the individual may be at risk of emotional harm. Support will be provided as required by the learner, their families and carers, and they will be encouraged to seek clinical help and advice.

When supporting a gender questioning child, CoreEd will consider the broad range of their individual needs, endeavouring to provide a trusted adult with whom they can be open about their gender and therefore support them in the workplace as necessary.

7. Additional Categories of Safeguarding

The government and all staff have recognised specific types of abuse and should have a good awareness of the safeguarding issues listed below. Information is taken from Annex B in 'Keeping Young Children Safe in Education' (September 2024) statutory guidance:

- Bullying and harassment (including cyber-bullying/online abuse)
- Children Absent from Education
- Children Missing from Home or Care
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- Child on Child Abuse

- Sexual Violence and Sexual Harassment between Children in Schools and Colleges
- Domestic Abuse
- Drugs and Alcohol
- Fabricated or Induced Illness
- Faith Abuse
- Female Genital Mutilation (FGM) – This must be reported to the Police if the person is younger than 18
- Forced Marriage
- Gangs and Youth Violence
- Gender Based Violence / Violence against Women / Girls (VAWG)
- Hate
- Mental Health
- Missing Children and Adults
- Private Fostering
- Preventing Radicalisation
- Relationship Abuse
- Serious Violence
- Sexting (also known as youth-produced sexual imagery)
- Trafficking
- Upskirting
- Children and the Court System
- Children with Family Members in Prison
- Child Criminal Exploitation: County Lines
- Homelessness
- So-called 'Honour-based' Abuse (including FGM and Forced Marriage)
- Child Abduction and Community Safety Incidents
- Modern Slavery and the National Referral Mechanism
- Cybercrime

Staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that young people are at risk. Staff should be clear on CoreEd policy and procedures regarding peer-on-peer abuse.

8. Keeping Up to Date

In recognition of the ever-evolving issues linked to the safeguarding of children and adults at risk, CoreEd will endeavour to update staff and learners' awareness of safeguarding through regular newsletters.

The senior DSL will update their awareness through NSPCC newsletters, attending online forums and webinars and through CPD.

9. Procedure Following a Disclosure or Suspected Case of Abuse

Where a young or vulnerable learner seeks out a member of staff to confide in and share information about abuse, neglect, or radicalisation, or talks spontaneously individually or in groups, our staff will:

- Listen carefully to them and do not directly question him/her.
- Give them time and attention.
- Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events.

- Make an accurate record of the information given, taking care to record the timing, setting and people present, as well as what was said. Do not discard this as it may be needed as evidence at a later date.
- Use the person's own words where possible.
- Explain that they cannot promise not to speak to others about the information that has been shared.

Reassure the person that:

- You are glad that they have told you.
- They have not done anything wrong.
- You will inform them of what you are going to do next.
- Help will be sought to keep them safe.
- The person should be asked NOT to repeat their account to anyone.

The DSL must be informed immediately, who will investigate the concern and take appropriate action. All records of the investigation will be kept strictly confidential and stored in a secure place.

10. Safeguarding Concerns and Allegations Made About Staff

Managing cases of allegations and/or concerns that might indicate a person will pose a risk of harm if they continue to work in regular or close contact with children will be dealt with under the Staff Code of Conduct Policy, in respect of all cases in which it is alleged that a teacher or member of staff (including supply staff, volunteers and contractors) may have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to young people.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These behaviours should be considered within the context of the definitions of abuse and neglect and should include allegations and/or concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that young person, even if consensual.
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence, or other 'grooming' behaviour giving rise to concerns of a broader child protection nature.
- Possession of indecent photographs/pseudo-photographs of children.

Responding to an Allegation or Concern

An allegation against a member of staff, supply staff, volunteer or contractor may arise from several sources. CoreEd will follow Local Authority Designated Officer (LADO) procedures for the location of the employer and learner, in dealing with the allegations, as they are there to protect both learners and staff.

Low-Level Concerns

Not all instances or allegations against a member of staff will meet the harm threshold; these are known as 'low-level concerns'. However, the term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern — no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' — that an adult working in or on behalf of CoreEd may have acted in a way that is inconsistent with our staff code of conduct.

Examples of such behaviour could include, but are not limited to:

- Being over-friendly with a young person.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating, or offensive language.

ALL STAFF are encouraged to report any concerns, no matter how small, regarding a staff member, supply staff member, volunteer, employer, or contractor's behaviour to the Company Director or senior DSL.

All concerns/allegations, including those which do not meet the harm threshold, will be shared responsibly and with the right person, recorded on SENTRY and dealt with appropriately.

11. Information Sharing

CoreEd recognises the importance of information sharing between practitioners and local agencies to identify and tackle all forms of abuse and neglect and to promote children's welfare, including their educational outcomes.

We will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or when a child is already known to local authority social care.

Information sharing will always be conducted in line with the Data Protection Act 2018 and the GDPR. We will ensure that we process personal information fairly and lawfully and keep the information we hold safe and secure.

We recognise that the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe. Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Under the Data Protection Act 2018 and GDPR we will treat Safeguarding information as 'special category personal data' (sensitive and personal) and will store and share this information accordingly.

We are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent if:

- It is not possible to gain consent.
- It cannot be reasonably expected that a practitioner gain consent.
- To gain consent would place a child at risk.

Safeguarding information that is shared electronically, e.g. CoreEd's Safeguarding Report form or a multi-agency referral form, will always be sent via secure means.

12. External Key Contacts

CoreEd has a Safeguarding Directory that holds all local authority contacts for each onboarded learner.

13. Delivery Context

CoreEd delivers Pharmacy and Business Services apprenticeships nationally. This policy applies across all programmes and sectors in which CoreEd operates. All staff delivering or supporting apprenticeship programmes are required to comply fully with the safeguarding procedures outlined in this document.

CoreEd Limited is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Date of review: 31/07/2025 Next review: 31/07/2026

Annex 1 – Procedure for Managing Concerns and Allegations Against Staff, Including Supply Staff, Volunteers and Contractors

There are up to three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Social care enquiries and/or assessment about whether a child needs protection or services.
- Consideration by the employer of disciplinary action.

The Local Authority Designated Officer (LADO) and the Senior Safeguarding Lead or Company Director should be consulted appropriately throughout this process.

Annex 2 – Managing Peer-on-Peer Sexual Violence and Sexual Harassment

This section is about managing reports of peer-on-peer sexual violence and sexual harassment. Information has been taken from Part 5 of 'Keeping Children Safe in Education' (September 2025) Guidance. It is included in this policy to help staff understand and manage the process for dealing with peer-to-peer Sexual Violence and Sexual Harassment.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. We should not feel that we are alone in dealing with sexual violence and sexual harassment. The Police and Children's Social Care are important partners and there are specialist support agencies that can also help, such as:

- The NSPCC, which provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for college staff and will be especially useful for DSLs.
- Specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust.

Definitions of Peer-on-Peer Sexual Violence and Sexual Harassment

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003:

- Rape: Person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: Person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, and B does not consent.
- Sexual Assault: Person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, and B does not consent.

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- A child at the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos, or drawings of a sexual nature.

- Online sexual harassment. This may include: non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages including on social media, and sexual exploitation, coercion and threats.

Responding to Reports

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

A child will likely disclose to someone they trust: this could be anyone at CoreEd. The person to whom the child discloses must recognise that the child has placed them in a position of trust. They should be supportive and respectful of the young person.

DSL Responsibilities

When there has been a report of sexual violence, the DSL should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider: the victim (especially their protection and support), the alleged perpetrator, and all other children at CoreEd, especially any actions that are appropriate to protect them.

If DSLs receive a report of peer-on-peer Sexual Violence or Sexual Harassment, a 'peer-on-peer Sexual Violence/Sexual Harassment Risk Assessment' should be carried out. Risk Assessments should be kept under review.

Managing the Report

It is important to consider every report on a case-by-case basis. There are four scenarios to consider:

- **Manage Internally** – In some cases of sexual harassment, e.g. one-off incidents, it may be appropriate to manage the incident internally, through using our Behaviour Policy and by providing pastoral support.
- **Early Help** – Providing support as soon as a problem emerges. Early help can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.
- **Referrals to Children Social Care** – Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral should be made to local children's social care.
- **Reporting to the Police** – Any report to the police will be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police.

Safeguarding and Supporting the Victim

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is possible. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

Support can include: Children and Young People's Independent Sexual Violence Advisors (ChISVAs), Children and Adolescent Mental Health Services (CAMHS), Rape Crisis Centre, and the Internet Watch Foundation (to potentially remove illegal images).

Safeguarding and Supporting the Alleged Perpetrator

CoreEd recognises it will have a difficult balancing act to consider. On one hand, we need to safeguard the victim (and the wider learner body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.

Harmful sexual behaviours in children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and/or materials. Advice should be taken, as appropriate, from social care, specialist sexual violence services and the police.