

# Safeguarding Policy

Protecting every learner in our care

**CoreEd Limited**

Version 3.0 | Review Date: 31/07/2027

## 1. Purpose and Scope

CoreEd Limited is committed to protecting the safety, welfare and wellbeing of every learner on our programmes, whether they are children or adults at risk. This policy sets out how we identify concerns, how we respond to them, who is responsible at each stage, and how we work with external agencies.

This policy applies to all staff, learners, contractors and employers involved in the delivery of CoreEd programmes. It applies to all provision, whether delivered remotely, at employer premises or elsewhere.

CoreEd operates a remote-first delivery model and does not maintain learner-facing premises. Where this policy refers to arrangements that assume a physical site, those arrangements apply to visits to employer premises and to any face to face activity undertaken on CoreEd business.

### How this guidance applies to CoreEd

Keeping Children Safe in Education 2026 (KCSIE 2026) is statutory guidance issued in part under the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). That Act requires Independent Training Providers to make arrangements to ensure their functions are exercised with a view to safeguarding and promoting the welfare of children receiving education or training with them. CoreEd is an Independent Training Provider and must have regard to KCSIE 2026 in respect of learners under the age of 18.

#### Scope note

Certain sections of KCSIE 2026, specifically those covering toilets, changing rooms and showers, and single-sex sport, state expressly that they do not apply to colleges outside the further education sector as defined by the Further and Higher Education Act 1992. CoreEd falls outside that sector and does not provide the facilities concerned. Those sections are therefore not applicable to CoreEd. All other parts of KCSIE 2026 apply in full.

Our duties towards adult learners are not set by KCSIE. They arise under the Care Act 2014, the Counter-Terrorism and Security Act 2015, our conditions of funding and our duty of care. This policy applies the same standard of care to all learners regardless of age, and identifies where a duty is specific to under-18s.

## 2. Legal and Regulatory Framework

This policy is written with regard to the following legislation and statutory guidance:

- Keeping Children Safe in Education 2026, in force from 1 September 2026
- Working Together to Safeguard Children 2026, published 18 March 2026
- Children Act 1989 and Children Act 2004

- Children and Families Act 2014
- Care Act 2014, in respect of adults at risk
- Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026
- Protection of Freedoms Act 2012
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, referred to collectively in KCSIE 2026 as the data protection laws
- Counter-Terrorism and Security Act 2015 and the Prevent duty guidance for England and Wales
- Equality Act 2010, including the Public Sector Equality Duty
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Modern Slavery Act 2015
- Disclosure and Barring Service Code of Practice

### 3. Definitions

|                             |                                                                                                                                                                                                                                                                                                                        |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child</b>                | Anyone who has not yet reached their eighteenth birthday.                                                                                                                                                                                                                                                              |
| <b>Adult at risk</b>        | A learner aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves.                                                                                                                                          |
| <b>Safeguarding</b>         | Providing help and support to meet the needs of learners as soon as problems emerge; protecting them from maltreatment, whether inside or outside the home and including online; preventing impairment of their mental and physical health or development; and taking action to enable them to have the best outcomes. |
| <b>Family Help</b>          | The coordinated system of support for children and families introduced by Working Together to Safeguard Children 2026, bringing together targeted early help and section 17 support into a single offer led by the local authority.                                                                                    |
| <b>DSL</b>                  | Designated Safeguarding Lead. At CoreEd the Senior DSL is the Head of Safeguarding and Welfare.                                                                                                                                                                                                                        |
| <b>LADO</b>                 | Local Authority Designated Officer. The officer responsible for managing allegations against adults who work with children.                                                                                                                                                                                            |
| <b>Low-level concern</b>    | Any concern that an adult working with learners has acted in a way that is inconsistent with the staff code of conduct, but which does not meet the threshold of harm.                                                                                                                                                 |
| <b>Extra-familial harm</b>  | Harm that occurs to a learner outside their family, including sexual abuse and exploitation, criminal exploitation, county lines, serious youth violence, teenage relationship abuse and radicalisation.                                                                                                               |
| <b>Nudes and semi-nudes</b> | The creation, sending or posting of nude or semi-nude images by people under the age of 18, including images that are digitally altered or wholly generated using artificial intelligence.                                                                                                                             |

### 4. Roles and Responsibilities

| Role             | Responsibility                                                                                                                                  |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Director and CEO | Holds strategic leadership responsibility for safeguarding arrangements. Ensures the DSL has the status, authority, time, funding, training and |

| Role                                          | Responsibility                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                               | resources to carry out the role. Approves this policy and ensures it is reviewed at least annually. Also acts as Deputy DSL, subject to the conflict of interest arrangements at Section 12.                                                                                                                              |
| Head of Safeguarding and Welfare (Senior DSL) | Takes lead responsibility for safeguarding and child protection, including online safety and oversight of filtering and monitoring. Manages referrals, maintains records on MyConcern, liaises with safeguarding partners, and leads staff training and awareness. This is explicit in the role holder's job description. |
| Safeguarding Team                             | Supports the Senior DSL with case work, record keeping and learner support, and provides cover in line with Section 5.                                                                                                                                                                                                    |
| Learner Support Lead                          | Leads inclusion support, maintains the inclusion dashboard, and refers welfare and safeguarding concerns to the Senior DSL.                                                                                                                                                                                               |
| All staff                                     | Read Part one of KCSIE 2026 in full and the Part one overview for all staff. Recognise and respond to concerns, report them to the DSL without delay, and record what was said accurately.                                                                                                                                |
| Employers                                     | Provide a safe working environment for apprentices, report safeguarding concerns to CoreEd promptly, and cooperate with any investigation or referral.                                                                                                                                                                    |

## 5. DSL Capacity, Cover and Multi-Agency Working

KCSIE 2026 requires that the DSL role carries appropriate status and authority, and that the postholder is given the additional time, funding, training, resources and support needed to carry it out effectively. CoreEd provides all of these and reviews the adequacy of that provision annually.

### Deputy arrangements

Any deputy DSL is trained to the same standard as the Senior DSL. Deputy training covers safeguarding and child protection at DSL level, Prevent, online safety, information sharing and multi-agency working.

### Cover

A DSL or deputy is available to discuss safeguarding concerns during working hours. Concerns are received through a confidential shared safeguarding mailbox monitored by the Safeguarding Team, so that a concern is picked up and acted on without delay during periods of leave, illness or absence. If in exceptional circumstances no DSL or deputy is available, this must not delay action. Staff should contact a member of the senior leadership team or take advice directly from the relevant local authority children's social care service, and inform the DSL as soon as practicable afterwards.

### Multi-agency working

CoreEd delivers nationally. The Senior DSL will identify and follow the published arrangements of the safeguarding partners for the area in which the learner lives or works, including local thresholds and referral routes. Where CoreEd is named as a relevant agency by a local safeguarding partnership, we are under a statutory duty to cooperate with the published arrangements and will do so.

## 6. Our Safeguarding Procedure: The Five Rs

All staff follow the same five step procedure. Only the referral step is restricted to the DSL.

| Step      | What this means in practice                                                                                                                                                                    |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recognise | Be alert to the signs and indicators of abuse, neglect and exploitation, in any setting, including online. Maintain an attitude of "it could happen here" and exercise professional curiosity. |
| Respond   | Stay calm, listen, and use open questions. Do not lead, probe or investigate. Never promise to keep a disclosure secret. Reassure the learner that they have done the right thing.             |
| Record    | Write down what was said as soon as possible afterwards, using the learner's own words, together with factual observations about their physical and emotional state.                           |
| Report    | Pass the concern to the Senior DSL immediately. If the DSL is unavailable or is the subject of the concern, follow the routes at Section 5 and Section 12.                                     |
| Refer     | The DSL decides whether a referral to Family Help, children's social care, the police or another agency is required. Only the Senior DSL or the Director and CEO make external referrals.      |

## 7. Recognising Abuse, Neglect and Exploitation

Abuse is a form of maltreatment. Someone may abuse or neglect a learner by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Learners may be abused by an adult, or by another young person.

Staff should be aware that safeguarding issues rarely occur in isolation and that in most cases several issues overlap. The categories below are indicative and not exhaustive.

|                              |                                                                                                                                                                                                                                                                           |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Physical abuse</b>        | Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm.                                                                                                                                                       |
| <b>Emotional abuse</b>       | Persistent emotional maltreatment causing severe and adverse effects on emotional development, including verbal abuse, belittling, silencing, serious bullying and cyberbullying.                                                                                         |
| <b>Sexual abuse</b>          | Forcing or enticing a learner to take part in sexual activities, whether or not they are aware of what is happening. This includes non-contact activity such as involvement in the production of sexual images and grooming, and can take place online.                   |
| <b>Neglect</b>               | Persistent failure to meet basic physical or psychological needs, likely to result in serious impairment of health or development.                                                                                                                                        |
| <b>Criminal exploitation</b> | Coercing or manipulating a learner into criminal activity, including county lines drug transportation, cannabis cultivation, theft, vehicle crime and the carrying of weapons. Girls are at risk of criminal exploitation as well as boys, and the indicators may differ. |
| <b>Sexual exploitation</b>   | A form of sexual abuse involving an exchange for something the victim needs or wants, or for the advantage of the perpetrator. This includes 16 and 17 year olds who can legally consent to sex.                                                                          |
| <b>Domestic abuse</b>        | A single incident or a pattern of psychological, physical, sexual, financial or emotional abuse. Learners may witness abuse at home or experience it in their own intimate relationships.                                                                                 |

## 8. Learners Who May Need Additional Support

Any learner may benefit from support before statutory intervention. Staff should be particularly alert to the potential need for additional support for a learner who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether or not they have a statutory Education, Health and Care plan
- has a mental health need
- is a young carer
- is pregnant, or is a parent themselves
- has exhibited early signs of abusive, violent or harmful behaviour
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, county lines or association with organised crime groups
- is frequently missing, or is absent from their programme, particularly on repeat occasions or for prolonged periods
- is at risk of exploitation, modern slavery or trafficking, whether criminal or sexual
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges, such as drug or alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol or other drugs themselves
- is at risk of honour based or faith based abuse, including female genital mutilation or forced marriage

### **Absence as an indicator**

KCSIE 2026 makes clear that being absent from education, not only missing from it, can be a warning sign of a range of safeguarding concerns including sexual abuse, sexual exploitation and criminal exploitation. Persistent or unexplained non-attendance at delivery sessions or reviews should be treated as a possible welfare indicator and raised with the Senior DSL, not managed solely as a compliance matter.

## **9. Extra-Familial Harm and Learner-on-Learner Abuse**

All staff, and particularly the Senior DSL, should consider whether learners are at risk of abuse or exploitation in situations outside their families. Extra-familial harm takes many forms and learners may be vulnerable to more than one at the same time, including sexual abuse, harassment and exploitation, teenage relationship abuse, criminal and financial exploitation, serious youth violence, county lines and radicalisation.

CoreEd considers contextual safeguarding by seeking to understand the wider environment in which each learner lives and works, and uses that information to assess whether external factors present a threat to their safety or welfare. Contextual information is recorded on MyConcern alongside the case record.

### **Learner-on-learner abuse**

Learners can abuse other learners. This happens inside and outside the workplace and online. It is a safeguarding issue for both the person harmed and the alleged perpetrator. Staff must challenge inappropriate behaviour rather than dismiss it. Treating sexual harassment as banter or as part of growing up contributes to a culture in which abuse becomes normalised and goes unreported.

Learner-on-learner abuse is most likely to include bullying, including cyberbullying and prejudice-based and discriminatory bullying; abuse in intimate relationships between young people; physical abuse; sexual violence and sexual harassment; causing someone to engage in sexual activity without consent; the consensual and non-consensual making or sharing of nudes and semi-nudes; upskirting; and initiation or hazing type violence.

## **10. Nudes and Semi-Nudes, and Online Harm**

Any incident involving the making or sharing of nudes or semi-nudes by a learner under 18 must be reported to the Senior DSL immediately. This includes images that have been digitally altered or wholly generated using artificial intelligence, sometimes described as deepfakes.

Staff must not view, copy, forward or store the image concerned. The report goes to the Senior DSL, who determines the response in line with the UK Council for Internet Safety guidance on sharing nudes and semi-nudes.

#### **Reporting is mandatory. The response is a professional judgement.**

Every incident must be reported to the Senior DSL. It does not follow that every incident receives the same response. KCSIE 2026 recognises that consensual image sharing, particularly between older learners of a similar age, may require a different response and may not be abusive, although learners still need to understand that it is unlawful. Non-consensual sharing is both unlawful and abusive. The Senior DSL decides the response case by case.

Online harm also includes abusive, harassing, misogynistic and misandrist messaging, the sharing of abusive images and pornography with people who do not wish to receive it, and threats of violence. Staff should report these to the Senior DSL in the same way. Online safety risks are categorised as content, contact, conduct and commerce, and are addressed in detail in the Online Safety and Remote Learning Policy.

#### **Filtering and monitoring**

CoreEd maintains appropriate filtering and monitoring systems on CoreEd-provided devices and systems. The Director and CEO is the named senior lead for filtering and monitoring. The effectiveness of these systems is reviewed at least once every academic year, supported by the Senior DSL and IT support, and a written record of each review and of the checks carried out is retained. Protecting personal information and maintaining appropriate cyber security are treated as part of our safeguarding responsibilities, in line with the Cyber security standards for schools and colleges.

## **11. Mental Health and Serious Violence**

Mental health problems can, in some cases, be a safeguarding concern. This includes self-harm, suicidal ideation and risk of suicide, and mental health difficulties can also indicate that a learner has suffered or is at risk of abuse, neglect or exploitation.

Only appropriately trained professionals can diagnose a mental health condition. Staff are not expected to diagnose. They are well placed to notice change, and should report to the Senior DSL where they observe significant changes in behaviour, ongoing difficulty sleeping, withdrawal from social contact, loss of interest in things a learner usually enjoys, or physical signs of self-harm or self-neglect.

Where a learner is in immediate danger, staff should call 999. Where a learner needs urgent help with their mental health but it is not an emergency, staff can contact NHS 111 and select the mental health option.

#### **Serious violence**

Staff should report to the Senior DSL any concern that a learner is carrying, threatening with or using a weapon, or has expressed an intention to do so. The Senior DSL will assess the risk to the learner and to others, and put in place a safety and support plan where appropriate. Risk is higher for learners with disrupted education histories or a history of offending.

## **12. Reporting, Referral and Allegations**

#### **Concerns about a learner**

Staff who have any concern about a learner's welfare should act immediately and report to the Senior DSL. The Senior DSL will then consider whether to manage support internally through our own pastoral processes, whether to seek a Family Help assessment, or whether to make a referral to statutory services because the learner is in need or is suffering, or is likely to suffer, harm.

Where a learner is suffering or is likely to suffer harm, a referral to local authority children's social care, and where appropriate the police, is made immediately following the local referral process. Local authorities should acknowledge a referral and decide next steps within one working day. If that acknowledgement is not received, the Senior DSL will follow it up. If a learner's situation does not improve after referral, the Senior DSL will use local escalation procedures.

### Allegations against staff

Any safeguarding concern or allegation that a member of staff, contractor or associate has harmed or poses a risk of harm to a learner must be referred to the Director and CEO, who will consider whether an onward referral to the Local Authority Designated Officer is required. Referral to the LADO should be made within one working day.

#### Conflict of interest: allegations involving the Director and CEO

The Director and CEO is the proprietor of CoreEd Limited and also acts as Deputy DSL. Where a concern or allegation is about the Director and CEO, or where reporting it internally would create a conflict of interest, it must be reported directly to the Local Authority Designated Officer for the relevant local authority, without being routed through the Director and CEO. Staff may also report externally at any time under the Whistleblowing Policy. Contact details for the relevant LADO are held by the Senior DSL and are available to all staff on request.

### Low-level concerns

A concern about adult conduct that does not meet the threshold of harm is a low-level concern. These must still be shared, with the Senior DSL, so that patterns can be identified before they escalate. Low-level concerns are recorded and reviewed in line with the Staff Code of Conduct. Staff should never dismiss a concern on the basis that it seems too minor to mention.

### Whistleblowing

All staff should feel able to raise concerns about poor or unsafe safeguarding practice, and to know they will be taken seriously. Where a member of staff feels unable to raise a concern internally, or believes a concern is not being addressed, they may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or at [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The line is open 08:00 to 20:00 Monday to Friday and 09:00 to 18:00 at weekends. Full arrangements are set out in the Whistleblowing Policy.

## 13. Information Sharing and Data Protection

Information sharing is vital in identifying and tackling abuse, neglect and exploitation. CoreEd staff are proactive in sharing information as early as possible to help identify, assess and respond to risks, whether problems are first emerging or a learner is already known to local authority children's social care.

#### Data protection laws do not prevent the sharing of information for the purposes of keeping learners safe.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of learners. If in any doubt, staff should speak to the Senior DSL rather than withhold information.

Safeguarding information is treated as special category personal data. The Data Protection Act 2018 provides safeguarding of children and individuals at risk as a processing condition allowing practitioners to share such information, including without consent where there is good reason to do so. It is legitimate to share without consent where it is not possible to obtain it, where it cannot reasonably be expected that a practitioner would obtain it, or where seeking it would place a learner at risk.

When deciding what to share, staff should consider the relevance of the information to the current safeguarding risk, what the receiving organisation needs to know, and whether it is clearly presented and properly contextualised. Professional judgement should be used to keep what is shared focused and proportionate, taking care not to omit information that is relevant to understanding or managing risk.

Safeguarding information shared electronically is always sent by secure means.

## 14. Record Keeping

All concerns, discussions, decisions and the reasons for those decisions are recorded in writing. Records are kept confidential and stored securely, and a separate safeguarding file is maintained for each learner concerned.

CoreEd records safeguarding cases on MyConcern, which holds the case record, the contextual safeguarding information and an appropriate risk rating. Access is restricted to the Senior DSL, the Safeguarding Team, the Learner Support Lead and the Director and CEO. All other staff access is on a need to know basis. Supporting documents are held in SharePoint and working notes relating to programme delivery are held in Aptem. Records are retained in line with the Data Retention Schedule.

Records must include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of any action taken, decisions reached and the outcome.

### Transfer of records

Where a learner transfers to another provider, school or college, the Senior DSL will ensure the safeguarding file is transferred securely and as soon as possible, and in any event within five days for an in-year transfer. Confirmation of receipt will be obtained and recorded. The Senior DSL will also consider whether any information should be shared in advance of the learner leaving, particularly where it would support an assessment of risk.

## 15. Safer Recruitment

CoreEd applies safer recruitment practice to identify and deter people who are unsuitable to work with children and adults at risk. Full arrangements are set out in the Safer Recruitment Policy. In summary, all staff undergo identity, right to work, qualification, reference and enhanced Disclosure and Barring Service checks appropriate to their role before commencing work, and all checks are recorded on the single central record.

### Removal of the supervision exemption

From 1 September 2026 the Crime and Policing Act 2026 amends the Safeguarding Vulnerable Groups Act 2006 to remove the supervision exemption from the definition of regulated activity as it applies to unpaid roles. Unpaid activity such as teaching, training, instructing or supervising children now falls within regulated activity where it is carried out frequently or meets the period condition, whether or not it is supervised. CoreEd engages no volunteers or unpaid staff, so this change has no operational effect on our current arrangements. Should CoreEd engage volunteers in future, the Safer Recruitment Policy requires an enhanced DBS check with children's barred list information to be obtained before that person begins any regulated activity.

## 16. Training and Awareness

All staff read Part one of KCSIE 2026 in full at induction and annually thereafter. The shortened Annex A version has been withdrawn and is no longer used. The Part one overview for all staff is issued alongside Part one as a quick reference and does not replace it.

All staff receive safeguarding and child protection training, including online safety and an understanding of roles and responsibilities in relation to filtering and monitoring, at induction. Training is updated regularly and all staff receive safeguarding updates at least annually.

Staff are asked to confirm that they have read and understood Part one, and complete an assessment on the current statutory changes. Completion is recorded and retained as part of our training records and is available for inspection.

Training covers the recognition of extra-familial harm, learner-on-learner abuse, online harm including AI-generated images, violence against women and girls, modern slavery and criminal exploitation, county lines, serious violence, teenage relationship abuse, radicalisation and mental health.

The Senior DSL and any deputy undertake DSL-level training which is refreshed at least every two years, with knowledge and skills updated at least annually.

## 17. Monitoring, Review and Evaluation

The Senior DSL monitors the operation of this policy on an ongoing basis and reports to the Director and CEO. Reporting covers the volume and nature of concerns raised, referral outcomes, themes and patterns, training completion, the outcome of the annual filtering and monitoring review, and any lessons learned.

This policy is reviewed at least annually and updated sooner where there is a change in legislation, statutory guidance or organisational circumstances, or following any significant incident. Any updates are communicated to all staff.

A copy of this policy is available to all staff via SharePoint and is published on the CoreEd website.

## 18. Associated Documentation

- Prevent Duty Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Online Safety and Remote Learning Policy
- General Data Protection Policy and Procedure
- GDPR and Privacy Policy
- Learner Data Sharing Agreement
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Reasonable Adjustment and Special Considerations Policy
- Data Retention Schedule

**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.**

**Policy owner:** Head of Safeguarding and Welfare

**Date of review:** 31/07/2026    **Next review:** 31/07/2027