Safeguarding policy

Version 2026/2027

Last review date	October 2026
Next review date	September 2027
Reviewed by	Charmaine Azam and Dan Grant

Amendments made since last review date	October 2026 – See "Summary of proposed amendments" on the next page.

Summary of amendments (October 2026)

- policy re-based on the adult safeguarding framework (Care Act 2014, six principles, Making Safeguarding Personal, ten categories of abuse, Mental Capacity Act principles) for an adult-only independent training provider.
- KCSIE 2026 added as good practice and older KCSIE summaries flagged for deletion.
- New legislation added (Crime and Policing Act 2026, Worker Protection Act 2023, Domestic Abuse Act 2021, Modern Slavery Act 2015).
- Ofsted FE and skills expectations (September 2026) including mental health.
- Safer recruitment/DBS for adult provision.
- Outdated references corrected.
- Review cycle changed to annual.
- New Appendices A.10 (local adult safeguarding contacts) and A.11 (mental health and suicide response).
- Safeguarding team updated: DSL and Prevent Lead Nic Parkinson.
- Deputy DSL and Deputy Prevent Lead Maimuna (Mai) Omar.
- DSOs Maimuna Omar, Cerys Browne and Rob Johns.
- Dr Dan Grant continues as independent scrutiny and is Advisory Board Safeguarding Specialist.
- Moodle button renamed "Report a Safeguarding".
- New section 5.8 (welfare vs safeguarding concern) and Birmingham LADO/children's/Prevent contacts added.
- MHFA network (17 across the group, MHFA forum), ACT and Martyn's Law representatives and health and safety contacts added.
- Filtering and monitoring leads and designated safeguarding mobile added.

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1.0 Introduction

LearningPlus recognises its statutory and moral duty towards safeguarding the welfare of children, young people and adults at risk from any form of abuse whilst receiving education and training. We expect all staff, volunteers and partners to endorse and practice this duty at all times. As a result, we have a zero-tolerance approach to abuse and other harmful behaviour. At LearningPlus safeguarding and promoting the welfare of children, young people and adults at risk is everyone's responsibility, everyone who comes into contact with children, their families and carers has a role to play in safeguarding. We comply with all government policy and UK legislation such as the Care Act 2014 and the Care and Support Statutory Guidance, the Mental Capacity Act 2005, the Counter-Terrorism and Security Act 2015 (Prevent duty) and, as good practice, "Keeping Children Safe in Education 2026" (see 3.1).

LearningPlus is an independent training provider delivering education and training to adult learners (aged 19 and over) only. Our provision is funded by the Department for Education (DfE) and by Mayoral Combined Authorities (West Midlands Combined Authority and South Yorkshire Mayoral Combined Authority). We are inspected by Ofsted under the Further Education and Skills inspection framework, which directs inspectors to the adult safeguarding guidance published by the DfE, the Disclosure and Barring Service (DBS) and the Department of Health and Social Care, and to the Prevent duty guidance.

2.0 Purpose

At LearningPlus we are committed to safeguarding and promoting the welfare of all learners, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child, young person or learner applies to all those aged under 18. LearningPlus does not enrol learners under 18. References to children are kept because staff may become aware of risks to children (for example a learner's own children, or children in their household) and must act on them by referring to children's social care or the police. Our legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone aged over 18 yrs. who may for a variety of reasons need community services and/or unable to protect him or herself from significant harm or exploitation. (See 5.2 for the Care Act 2014 definition.)

LearningPlus has developed procedures in line with, and taking account of, guidance issued by the Department for Education, Leaders in Safeguarding and other relevant bodies. We operate in line with the requirements of the local authority (Borough) safeguarding arrangements and the Safeguarding Adults Board procedures for the area where the learner lives (see Appendix A.10).

Whilst overall responsibility for safeguarding children, young people and vulnerable adults is vested in the Managing Director; LearningPlus has a named Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers who are responsible for ensuring compliance to this policy and its procedures. The role and responsibilities and contact details of the DSL and DSO's can be found in section 4. The DSL is Nic Parkinson, the Deputy DSL is Maimuna (Mai) Omar, and the Designated Safeguarding Officers are Maimuna Omar, Cerys Browne and Rob Johns; contact details are in Appendix A.2.

3.0 Scope

This policy applies to all learners and particularly children, young people and adults who may need support and all staff, volunteers, partners and families visiting and working at our centres, other external facilities, in the workplace, distance learning and subcontractors.

In order to help ensure that children, young people and adults at risk are protected from abuse, all complaints, allegations or suspicions will be taken seriously and in accordance with this policy detailed herein.

LearningPlus has incorporated child protection into the whole organisational approach to safeguarding and the term safeguarding is deemed to include child protection in all our policies and procedures.

3.1 Statutory and guidance framework

Because all LearningPlus learners are adults, our safeguarding duties come mainly from adult safeguarding law and guidance, our Prevent duty, and the safeguarding requirements in our DfE and Mayoral Combined Authority funding agreements. In order of relevance, this policy is based on:

- Care Act 2014 (sections 42–47) and Chapter 14 of the Care and Support Statutory Guidance
- Mental Capacity Act 2005 and its Code of Practice
- Counter-Terrorism and Security Act 2015, section 26 (Prevent duty), the Prevent duty guidance for England and Wales (2023) and DfE "The Prevent duty: practical guidance for designated safeguarding leads" (September/October 2026) – see the Prevent Policy
- Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) and DBS guidance
- Equality Act 2010, including the duty to take reasonable steps to prevent sexual harassment of employees (Worker Protection (Amendment of Equality Act 2010) Act 2023, in force 26 October 2024)
- Domestic Abuse Act 2021; Modern Slavery Act 2015; Crime and Policing Act 2026
- UK GDPR and the Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025)
- Terrorism (Protection of Premises) Act 2025 (not yet in force – see Prevent Policy 10.5)
- Ofsted Further Education and Skills inspection toolkit and operating guide (versions in use from September 2026)
- DfE and Mayoral Combined Authority funding rules and grant agreements [Reviewer: insert the specific safeguarding clauses from current agreements]
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children – as good practice, and where a learner discloses a risk to a child

The legal framework for the role of LearningPlus is as follows:

Keeping Children Safe in Education (2026)

KCSIE 2026 came into force on 1 September 2026 and replaced KCSIE 2025. It is statutory guidance for schools and colleges; LearningPlus uses it as good practice only. Changes relevant to LearningPlus include: all staff are expected to read Part One in full (Annex A has been removed); filtering and monitoring should be reviewed at least once every academic year; a direct reference to the DfE cyber security standards and to DfE guidance on generative AI; updated safer recruitment material in Part 3; and more content on violence against women and girls, AI-generated imagery and information sharing.

Online safety

The 2025 guidance adds disinformation, misinformation and conspiracy theories to the list of content risks under online safety. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023)

Definitions:

-**Misinformation** is false or inaccurate information — getting the facts wrong. This type of content is not necessarily created with harmful intent, but it can still mislead or confuse individuals, especially children and young people.

-**Disinformation** is false information which is **deliberately intended to mislead** — intentionally misstating the facts. This is more dangerous than misinformation because it is created and spread with the purpose of deceiving others, often to manipulate opinions or behaviours.

-A **conspiracy theory** is a belief that **some secret, but influential, organisation is responsible** for an event or phenomenon. These theories often lack credible evidence and can foster distrust in institutions, authorities, or factual information.

Working Together to Safeguard Children 2026

Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard and promote the welfare of children and young people. It sets out the framework for multi-agency safeguarding arrangements, including the responsibilities of safeguarding partners and the management of child protection concerns. The guidance supports early intervention, information sharing, and coordinated action to protect children from harm. It also provides the framework for local authorities and partner agencies to undertake assessments and implement appropriate safeguarding measures where concerns are identified. For LearningPlus, this applies where a learner discloses concerns relating to a child or where there are concerns that a child may be at risk of harm.

Safeguarding Vulnerable Groups Act (2006 changes updated 2021)

The Disclosure and Barring Service (DBS) has been introduced to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. Teaching or training adults is generally not "regulated activity" with adults. Regulated activity with adults covers healthcare, personal care, social work, help with cash, bills or shopping, help with the conduct of a person's own affairs, and conveying. The level of DBS check for each role must therefore be decided using DBS eligibility guidance (see section 8).

DFE Statutory Guidance (2014)

Provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. The guidance plays an important role in embedding this responsibility in the work of key agencies which have contact with children and young people. It reflects the recognition that protecting children from harm cannot be separated from policies to improve children's lives as a whole.

Protection of Freedoms Act (2012) Part 5 Safeguarding vulnerable groups, criminal records etc.

Covers the reduction in scope of the definition of regulated activity, new services provided by the DBS, and disregarding convictions and cautions for consensual gay sex.

Mental Capacity Act (2005)

Provides a way in which people who may need help to make decisions can get that help from someone who can be trusted to act in their best interests. Mental Capacity under the Act means being able to make your own decisions. The Mental Capacity Act and its Code of Conduct contain a set of rules, procedures and guidance. The Act applies in full to those aged 18 or over, the entire Act except making Power of Attorney or Making a Will applies to 16- and 17-year-olds. The Act only applies to those under 16 in very limited circumstances and these would have to be determined by a court.

The five statutory principles are: (1) a person must be assumed to have capacity unless it is established that they lack it; (2) all practicable steps must be taken to help a person make a decision before treating them as

unable to; (3) a person is not to be treated as lacking capacity because they make an unwise decision; (4) any act or decision for a person who lacks capacity must be in their best interests; (5) the least restrictive option should be considered. The Liberty Protection Safeguards have still not been implemented and the Deprivation of Liberty Safeguards (DoLS) remain the legal framework [Reviewer: this may change – check before publication].

Children's Act 2004

The 2004 Children's Act was introduced as a development and extension of the same act from 1989. The main way in which the 2004 Children's Act differentiates from the 1989 Children's Act is in its focus on ensuring that all people (both individuals and organisations) that are working with children have a responsibility for safeguarding children and promoting their welfare.

The Marriage and Civil Partnership (Minimum Age) Act 2022

Came into force on 27 February 2023. It means that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Forced marriage of an adult remains a criminal offence and must be reported (Forced Marriage Unit: see Appendix A.9).

Other legislation relevant to adult learners

- **Domestic Abuse Act 2021** – statutory definition of domestic abuse, including controlling or coercive behaviour and economic abuse.
- **Modern Slavery Act 2015** – LearningPlus is not a National Referral Mechanism first responder; concerns are referred to the police, the local authority or the Modern Slavery Helpline. Home Office statistics show 25,373 potential victims referred in the year to June 2026, with UK nationals the most common group (22%).
- **Crime and Policing Act 2026 (Royal Assent 29 April 2026)** – creates offences including controlling another person's home for criminal purposes ("cuckooing", which often targets vulnerable adults), child criminal exploitation, and a mandatory duty to report child sexual abuse for those in relevant activity with children. Commencement dates vary by provision and some are not yet in force – The legislation website specifically notes that there are provisions still to be brought into force at a future date. [legislation.gov.uk]
- **Equality Act 2010 / Worker Protection Act 2023** – since 26 October 2024 employers must take reasonable steps to prevent sexual harassment of their employees, including by third parties such as learners or visitors.
- **Online Safety Act 2023** – created new offences including sharing or threatening to share intimate images without consent.
- **Data (Use and Access) Act 2025** – When safeguarding concerns arise, information may be shared lawfully where it is necessary, proportionate and in line with data protection requirements. Data protection law should not be viewed as a barrier to sharing information where there are concerns about the safety or welfare of a child or vulnerable adult.

3.2 Care Act 2014 and the adult safeguarding framework

Chapter 14 of the Care and Support Statutory Guidance sets out how adults are safeguarded in England. LearningPlus applies it as follows.

Section 42 duty. The local authority must make enquiries (or cause others to) where it has reasonable cause to suspect that an adult (a) has needs for care and support (whether or not the local authority is meeting any of those needs), (b) is experiencing, or is at risk of, abuse or neglect, and (c) as a result of those care and support needs is unable to protect themselves from the abuse or neglect or the risk of it. This applies whether or not the adult has mental capacity. Many LearningPlus learners will not meet this test;

they still receive safeguarding support (advice, signposting, referral to domestic abuse services or the police) whenever they are at risk of harm.

The six safeguarding principles:

- **Empowerment** – people are supported and encouraged to make their own decisions and give informed consent (e.g. we ask the learner what outcome they want before referring).
- **Prevention** – it is better to take action before harm occurs (e.g. induction, tutorials and early help).
- **Proportionality** – the least intrusive response appropriate to the risk.
- **Protection** – support and representation for those in greatest need.
- **Partnership** – local solutions through services working with their communities.
- **Accountability** – accountability and transparency in safeguarding practice (e.g. clear records of decisions and rationale).

Making Safeguarding Personal. Safeguarding with adults is person-led and outcome-focused. Staff talk with the learner about the concern, seek and record their views and consent wherever possible, and record the reason when acting without consent. Information may be shared without consent where others are at risk, a serious crime has been or may be committed, the learner is subject to coercion or undue influence, or the learner lacks capacity to make the decision.

Ten categories of abuse and neglect (Care Act statutory guidance): physical abuse; domestic abuse (including coercive control and so-called "honour"-based violence); sexual abuse; psychological abuse; financial or material abuse; modern slavery; discriminatory abuse; organisational abuse; neglect and acts of omission; and self-neglect. These are reflected in 5.7.

Referral route for adults. Concern to DSL the same day → DSL decides and records the rationale: no further action; internal support or signposting; referral to the local authority adult social care "front door" for the area where the learner lives (Appendix A.10); police (999 in an emergency, 101 otherwise); or a specialist service (e.g. domestic abuse). The learner's home local authority is recorded on the concern log.

4.0 Duties

4.1 The Role of the Designated Senior Person

The Designated Senior Person is committed to ensuring that LearningPlus:

- raises awareness of issues relating to safeguarding and promotes the welfare of all
- provides a safe environment for children, young people and adults at risk
- identifies those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe
- has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- operates safe recruitment procedures
- designates a member of staff with sufficient authority to take a lead role for safeguarding
- remedies any weaknesses and areas for improvement relating to safeguarding that are brought to their attention
- ensure all staff members receive appropriate child protection and safeguarding training which is regularly updated.
- names the senior leads accountable for filtering and monitoring (Cerys Browne and Maimuna (Mai) Omar, with escalation to Nic Parkinson (DSL)) and ensures the arrangements are reviewed at least annually

4.2 The Role of Staff

4.2.1. Staff Member with Lead Responsibility

There is a designated member of staff with lead responsibility for safeguarding issues. The key responsibility of that member of staff is to lead on raising staff awareness concerning all issues relating to safeguarding, and to promote LearningPlus as a safe environment for learning and being cared for. They have received the appropriate training as required by the Safeguarding Children Partnership and Safeguarding Adults Board and will maintain the currency of their knowledge on safeguarding issues. The Designated Safeguarding Lead (DSL) is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Giving advice and support to staff on matters relating to safeguarding
- Maintaining a proper record of any safeguarding referral, complaint, or concern received, including the rationale for each decision (including decisions not to refer)
- Ensuring that adults at risk, and where appropriate and with consent their carers or advocates, are aware of the safeguarding policy
- Liaising with other agencies as necessary
- LearningPlus has no school-age learners
- Ensuring there is liaison with employers and training organisations providing learners with placements to ensure proper safeguarding arrangements are in place
- Ensuring that all staff receive training about safeguarding matters and the procedures
- Providing termly reports to the Safeguarding Board
- Reporting any flaws in procedure to the Safeguarding Board as soon as possible recording rigorous reports and/or statements
- Storing all information and recordings in a secure manner and in accordance with Data Protection Act 2018 (GDPR)
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Having received training in safeguarding issues and inter-agency working, as required by the Safeguarding Children Partnership, and will receive refresher training at least every 2 years
- In the absence of the DSL a deputy DSL (Maimuna Omar) will carry out the same responsibilities. In the absence of both of these, the Director of Human Resources or Director will carry out their responsibilities.
- Taking lead responsibility for understanding the filtering and monitoring systems and acting on alerts escalated by the filtering and monitoring leads (Cerys Browne and Maimuna (Mai) Omar)
- Completing advanced Prevent training at least every two years and acting as, or working closely with, the Prevent Lead (see Prevent Policy section 8.3)
- Ensuring learners at risk of harm from mental health issues developing into safeguarding concerns (for example eating disorders, self-harm or suicidal ideation) are identified and supported (Ofsted FE and skills toolkit, September 2026)
- Keeping an anonymised sample of casework, referrals and outcomes ready for inspection, and meeting inspectors on day 1

4.2.2. All Staff

The Managing Director, members of the Board, members of the Senior Management Team and all staff will receive training to familiarise them with safeguarding issues and the policy and procedures, with refresher training at least every two years and safeguarding updates at least annually. All staff must read this policy (and, as good practice, Part One of KCSIE 2026) and confirm they have done so.

Staff are made aware of the importance of: making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as "banter", "just having a laugh" or "boys being boys"; challenging behaviours(potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and up skirting (as per KCSIE 2025); dismissing or tolerating such behaviours risks normalising them. This applies equally between adult learners, between learners and staff, and from visitors or employers. LearningPlus takes reasonable steps to prevent sexual harassment of its employees in line with the Equality Act 2010 (as amended by the Worker Protection Act 2023).

5.0 Definitions

5.1 Child

Within the context of this policy a "child" is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). LearningPlus does not deliver to learners under 18; this definition is used where staff become aware of a risk to a child.

5.2 Adult at Risk

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an "adult at risk" is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) we use the following indicators to identify an adult who is, or may become "at risk" whilst they are registered with us:

Proposed replacement definition (Care Act 2014, section 42): an adult at risk is an adult who (a) has needs for care and support (whether or not those needs are being met), (b) is experiencing, or is at risk of, abuse or neglect, and (c) as a result of those needs is unable to protect themselves from the abuse or neglect or the risk of it. The Law Commission (1995) indicators below are retained as helpful prompts only.

The individual:

i. Is or may need community care services by reason of mental or other disability, age, or illness

ii. Is or may be unable to take care of themselves

iii. Is unable to protect themself against significant harm or serious exploitation

Whilst not definitive, the main categories of people covered by the definition of "adult at risk" include those who:

i. Have a learning disability

ii. Have a physical or sensory impairment

iii. Have a mental illness including dementia

iv. Are old and frail

v. Are detained in custody or under a probation order

vi. Are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)

5.3 Children in Need of Protection and Early Help

Some children and young people are in need because they are suffering or likely to suffer "significant harm". Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the

welfare of a young person, this can be done through contacting the local authority early help team to share concerns and ensure the early identification of needs within families.

5.4 Children in Need

Children and young people who are defined as being "in need" under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a child in need.

5.5 Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We will ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. The appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated teacher/person for looked after children will ensure that the designated safeguarding coordinator will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Some learners may be care leavers (aged 19–25) and may continue to receive support from their local authority up to the age of 25. Care leavers can face additional challenges and may be more vulnerable to safeguarding concerns, including exploitation, mental health difficulties, housing instability and financial hardship.

Staff should be aware of these potential vulnerabilities and provide appropriate support, referring any safeguarding concerns in line with this policy. Where appropriate and with the learner's consent, liaison may take place with the learner's Personal Adviser or other relevant support services to help promote their wellbeing and safety.

5.6 Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm.

The Act also gives powers to the police to take emergency action to protect a young person from significant harm.

Please note: sections 5.3 to 5.6 relate to children. They are retained for reference where a learner discloses a risk to a child; any such concern is referred to children's social care for the area where the child lives.

5.7 Abuse

"Abuse" relates to the mistreatment of an individual's human and civil rights by any other person or persons and may consist of single or repeated acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

Within the context of this policy abuse and harmful behaviours are defined through six main categories:

i. **Physical**: this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or

otherwise causing physical harm to a child, young person or vulnerable adult including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000).

ii. **Emotional/psychological:** this is the persistent emotional ill-treatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on their emotional development. This may involve the imposition of age or developmentally inappropriate expectations resulting in fear, exploitation or corruption. This may also include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Threats of harm or abandonment; humiliation; blaming; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving services or support are all forms of emotional abuse (DoH 2000). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

iii. **Sexual:** such as rape, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities such as involving the child, young person or vulnerable adult in looking at, or in the production of, pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (DoH 2000).

iv. **Sexual Violence** - refers to sexual offences under the Sexual Offences Act 2003 as described below:

• Rape: A 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: A 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, B does not consent to the penetration and A does not reasonably believe that B consents.

• Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

v. **Consent** -16 is the legal age of consent for individuals in the UK. 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, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

vi. **Upskirting:** The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

vii. **Sexting (Semi Nudes & Nudes)** 'Sexting' may be defined as images or videos generated: by young people under the age of 18, or of young people under the age of 18 that are of a sexual nature or are indecent. These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know. Young people often do not anticipate the implications and consequences of sharing things online as they would offline; however, the consequences of sexting can be devastating. Once the image is in the public domain, it is difficult to control, to know who has seen it and what they have done with it. The social and psychological effects on individuals can be significant; in extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Because of the prevalence of sexting, young people are not always aware that, in the context of the law, sexting is illegal. As with all safeguarding issues and concerns, it is vitally important for all staff to be vigilant, noticing any concerns about young people sending, receiving and/or disseminating indecent images of themselves and other young people. If staff notice any concerns, they must report them to the Designated Safeguarding Lead as with any other safeguarding concern. Staff should not make their own judgements about whether a 'sexting' issue is more or less serious enough to warrant a report. What may seem like less serious concerns to individual members of staff, may be more significant when considered in the light of other information known to the DSL of which the member of staff may not be aware. Further guidance on how to deal with sexting concerns can be found on the UK Council for Internet Safety (UKCIS) website. (gov.uk – "UK Council for Internet Safety"). For adults, sharing or threatening to share intimate images without consent is a criminal offence; concerns, including AI-generated ("deepfake") intimate images, must be reported to the DSL.

viii. **Neglect or acts of omission:** this includes the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psycho-social needs, and which are likely to result in a serious impairment of the individual's health or development. This may include failing to provide adequate food, shelter and clothing, or educational services and/or neglect of, or unresponsiveness to, a child, young person or vulnerable adult's basic emotional need (DoH 2000).

ix. **Financial or material:** this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewellery or personal property, loss of money from a wallet or purse (DoH 2000). It also includes scams (including online and romance scams), loan sharks, misuse of benefits, and being coerced into acting as a "money mule".

x. **Discriminatory**: this may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or sexual orientation (DoH 2000).

xi. **Specific issues and further information:** specific advice should also be sought in relation to specific situations including forced marriage, the effects of domestic violence on young people, female genital mutilation, children and young people who sexually abuse or who are exploited and those affected by drug and alcohol abuse in families.

xii. **Abuse of trust:** under the Sexual Offences Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments. Staff must also maintain professional boundaries with adult learners; a relationship with a learner must be declared to the line manager under the staff code of conduct.

xiii. **Radicalisation:** The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk)

xiv. **Online Abuse**: any type of abuse that happens on the web, whether through social networks, playing games online or using mobile Phones. Refer to E-safety policy.

xv. **Child sexual exploitation:** Is a type of abuse where children are sexually exploited for money, power or status.

xvi. **Female genital mutilation**: FGM is the total or partial removal of the external female genitalia for non-medical reasons.

xvii. **Domestic abuse:** witnessing domestic abuse is child abuse. For adults, domestic abuse is defined in the Domestic Abuse Act 2021 and includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological or emotional abuse by someone aged 16 or over who is "personally connected" to the victim.

xviii. **Teenagers** can suffer domestic abuse in their relationships.

xix. **Child trafficking**: Is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold.

xx. **Harmful sexual behaviour:** Children or young people develop sexual behaviours that harm themselves or other.

xxi. **Extra-familial harms**: take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

xxii. **Adults who are Lesbian, Gay, Bi, or Trans (LGBT)** Being LGBT is not, in itself, a risk factor for harm. However, LGBT adults may face discrimination, exclusion, or targeted behaviour from others. In some cases, individuals who are perceived to be LGBT—regardless of whether they identify as such—can be just as vulnerable to mistreatment. Risks may be heightened when LGBT adults lack trusted colleagues, friends, or support networks with whom they feel safe to be open. It is therefore essential that organisations and communities work to reduce barriers, foster inclusivity, and provide safe spaces where individuals feel empowered to speak out or seek support.

xxiii. Children/adults with special educational needs (SEN) and disabilities can face additional safeguarding challenges. LearningPlus recognises the fact that additional barriers can exist when recognising abuse and neglect in this group of individuals. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the individual's disability without further exploration;
- being more prone to peer group isolation than others;
- the potential for individuals with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

xxiv. **Mental health, self-harm and suicide.** Mental ill-health can develop into a safeguarding concern. Ofsted's FE and skills toolkit (September 2026) expects safeguarding arrangements to identify learners at risk of harm from mental health issues developing into safeguarding concerns, such as eating disorders, self-harm or suicidal ideation. Staff must pass these concerns to the DSL on the same day and follow Appendix A.11.

xxv. **Self-neglect.** Neglecting personal hygiene, health or surroundings to an extent that threatens personal health and safety, including hoarding (Care Act statutory guidance).

xxvi. **Organisational abuse.** Neglect and poor practice within an institution or care setting, or in relation to care provided in a person's own home, ranging from one-off incidents to ongoing ill-treatment.

xxvii. **Modern slavery.** Slavery, human trafficking, forced labour and domestic servitude. Indicators include a learner who appears controlled by others, has no access to their own documents or wages, or is transported to and from work or training.

xxviii. **Criminal exploitation of adults and "cuckooing".** Adults with care and support needs, learning disabilities or substance misuse are targeted by criminal networks, including county lines. "Cuckooing" – taking over a person's home for criminal purposes – is a criminal offence under the Crime and Policing Act 2026.

5.8 Welfare concern or safeguarding concern?

The terms are related but not the same. Staff should record both and pass any doubt to the DSL – it is the DSL's role to decide which route applies.

A welfare concern is any issue that may affect a person's overall wellbeing, health or quality of life, without necessarily meaning they are at risk of abuse or neglect – for example stress or anxiety, financial hardship, isolation or loneliness, caring responsibilities, or poor attendance. Welfare concerns may need support, monitoring, reasonable adjustments to learning or signposting (for example through The Waiting Room app), but do not automatically trigger safeguarding procedures.

A safeguarding concern arises when there is a concern that a learner (or a child or other adult known to them) is experiencing, or is at risk of, abuse, neglect, exploitation or significant harm – for example unexplained injuries, a disclosure of abuse, domestic abuse, financial abuse, radicalisation, exploitation or trafficking, or suicidal thoughts. Safeguarding concerns require formal reporting under this policy and may involve adult or children's social care, the police or other agencies.

Welfare concern	Safeguarding concern
Relates to general wellbeing and support needs.	Relates to actual or potential abuse, neglect, exploitation or harm.
May need support, monitoring or adjustments to learning.	Requires safeguarding action and reporting to the DSL the same day.
Risk of harm is low or absent.	Risk of harm is present or suspected.
Examples: stress, financial hardship, isolation, caring pressures, poor attendance.	Examples: abuse, neglect, exploitation, radicalisation, serious self-harm or suicide risk.

Welfare concerns can escalate. Staff should keep checking in with the learner, and pass the concern to the DSL straight away if the risk of harm increases. In one recent case a tutor, the quality team and the safeguarding team worked together so that a learner who had become a carer could stay on programme with adapted assessment, a later completion date, regular check-ins and signposting. This is an example of a proportionate, person-centred welfare response (Source: LearningPlus Safeguarding Case Study, anonymised).

6.0 Radicalisation and acts of terrorism

The Counter Terrorism & Security Act (2015 with updates 2021) and The Prevent Duty

This section summarises our Prevent duty; the full procedure is in the LearningPlus Prevent Policy 2026-2027. The UK national threat level is currently SEVERE (an attack is highly likely), having been raised on 30 April 2026. The DfE's "The Prevent duty: practical guidance for designated safeguarding leads" (September/October 2026) applies to independent training providers and adult learners.

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and
- The threat we face from those who promote these views
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with
- The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.
- The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Offices uses a range of measures to challenge extremism in the UK, including:
- Where necessary, preventing apologists for terrorism and extremism from travelling to this country
- Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- Funding a specialist police unit which works to remove online content that breaches terrorist legislation
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- Supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including skills training, further and higher education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

LearningPlus is committed to supporting vulnerable students through its safeguarding policies and procedures and recognises that this can support the contribution to the Prevent duty. An individual does not need to show a clear or identifiable ideology for a Prevent referral to be appropriate, and staff must not delay passing a concern to the DSL in order to gather more evidence.

Serious Violent Crime: As included in KCSIE 2025, all staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or significant change in well-being.

- signs of assault or unexplained injuries.
- unexplained gifts or new possessions.

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. The same indicators (for example unexplained absence, new associates, unexplained money or possessions) can apply to adult learners who are being criminally exploited.

All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice can be provided in the Home Office's 2018 guidance documents: Preventing Youth Violence and Gang Involvement and Criminal exploitation of children and vulnerable adults: county lines guidance.

7.0 Management of processes

7.1 Dealing with disclosure of abuse and procedure for reporting concerns

A member of staff may suspect that a learner is being abused or is at risk of significant harm. A learner may disclose to a member of staff that they are being abused. In these circumstances the following procedure should be followed.

7.1.1. Significant Concerns

If a member of staff has concerns about a learner but does not believe that they are being abused or are at risk of immediate harm, the member of staff should:

- Speak to the learner about the concerns and, in line with Making Safeguarding Personal, ask what they would like to happen
- Speak to a Designated Safeguarding Lead who will consider and advise whether LearningPlus should register the concern

7.1.2. Disclosure of Abuse

If a disclosure is made or abuse is suspected, staff should:

- Listen carefully and stay calm
- Question without pressure to be sure that what is being said is properly understood by the member of staff
- Reassure the individual concerned that they have done the right thing
- Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it. Say who will receive the information
- Note the main points carefully - what the individual said or did and the questions asked by the member of staff
- Make a note of the date, time and place
- Complete a Safeguarding Incident/ Concern Form , or use the Moodle "Report a Safeguarding" button, on the same day. Record any online/digital context (platform, content, contacts) and the learner's views and whether they consented to the concern being shared.

Staff must not:

- Ask leading questions or put words into the mouth of the disclosing individual
- Investigate concerns/allegations
- Promise confidentiality
- Use AI tools to write or summarise safeguarding records

7.1.3. Reporting to Designated Staff

Staff should report concerns, suspicions or disclosures of abuse immediately to the Designated Safeguarding Lead (DSL). If they are not available, the report should be made to the Deputy DSL (Maimuna

Omar) or, if neither is available, another Designated Safeguarding Officer (DSO) – see Appendix A.2. If there is immediate danger, call 999 first.

7.2 Reporting to the DSL

The designated member of staff must notify the Managing Director as soon as possible and always within 24 hours of a serious disclosure or suspicion being raised.

7.2.1. Contact with External Services

The DSL or Managing Director (deputising senior manager) must report the mater to children's social care, adult services, or the police by phone immediately, followed up by written confirmation or email within 48 hours. Where a request for service form or an early help assessment is completed and sent via email to children's social care, staff can expect a response via email within 48 hours.

For adult learners, concerns are raised with the adult social care "front door" for the local authority where the learner lives (Appendix A.10); several local authorities now require professionals to use an online form. The DSL seeks the learner's consent where possible and records the reasons if information is shared without consent (see 3.2).

A written record of the date and time of the report must be made, and the document should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate local authority form within 24 hours.

The designated member of staff should note down the detail of the discussion about action to be taken to inform the parents/carers, depending on the circumstances. The process for keeping LearningPlus informed of further action should also be discussed.

7.2.2. Confidential Reporting

Whistleblowing and Safeguarding schemes are available to all staff employed by LearningPlus.

7.3 Procedure for Managing Allegations of Abuse Against Staff

LearningPlus is required to comply with the detailed Safeguarding Children Partnership procedure for managing allegations against staff. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers, and are in line with our low-level concerns Policy and Procedure. Where an allegation concerns harm to an adult, LearningPlus follows the local Safeguarding Adults Board "Person in a Position of Trust" (PiPoT) procedure. The LADO is consulted where the allegation suggests the person may pose a risk to children (transferable risk). Birmingham LADO: via Birmingham Safeguarding Children Partnership, 0121 464 2612, BSCP.ContactUs@birminghamchildrenstrust.co.uk; for other areas contact the LADO for the local authority where the person works (Appendix A.10).

7.3.1. Introduction

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. LearningPlus recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

LearningPlus recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the LearningPlus will do so with sensitivity and will act in a careful, measured way.

7.3.2. Receiving an Allegation

A member of staff who receives an allegation about another member of staff should follow the guidelines for dealing with disclosure.

The allegation should be reported immediately to the Director of Human Resources and Managing Director. If the Director of Human Resources is the person against whom the allegation is made, the report should be made to the Managing Director.

The DSL and Director of Human Resources, if the allegation is against the Managing Director should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL/Director of Human Resources.
- Record information about times, dates, locations and names of potential witnesses.

If the allegation is against the Managing Director, the Deputy Designated Senior Person should be the person to receive it.

7.3.3. Initial Assessment by the Designated Person

The Director of Human Resources should make an initial assessment of the allegation, consulting with the DSL and the relevant local authority's children's services or adult services safeguarding team as appropriate.

An allegation is information which indicates that a person who works with a child, young person or vulnerable adult has:

- behaved in a way that has harmed or may have harmed a child or young person or adult at risk.
- possibly committed a criminal offence against or related to a child or young person or adult at risk.
- behaved towards a child or young person in a way that indicates they are unsuitable to work with children and young people.

It is important that the Director of Human Resources does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

If the assessment of the allegation is that it requires to be investigated, then an investigation will take place in accordance with the LearningPlus' disciplinary policy. The local authority designated officer (LADO) will be advised and kept fully informed of progress and outcome.

In relation to allegations against supply staff, KCSIE 2025 states 'the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process'. Therefore, LearningPlus will act as lead professional for these allegations and communicate regularly with the LADO and supply agency. Supply agencies will be informed of LearningPlus process for managing allegations.

7.3.4. Enquiries and Investigations

Child protection enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by LearningPlus. LearningPlus may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct LearningPlus to act in a particular way however, LearningPlus should assist the agencies with their enquiries.

LearningPlus will instigate its own internal enquiries regardless of any formal police or social services investigations but will ensure that this will not prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the DSL and/or Director of Human Resources should normally be involved in, and contribute to, the inter-agency strategy discussions. The DSL and Managing Director are responsible for ensuring that LearningPlus gives every assistance with the agency's enquiries.

They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The DSL (or Director of Human Resources) shall advise the member of staff that they should consult with a representative, for example, a trade union.

The Director of Human Resources will consult with Social Services, the police or the Children's Integrated Services Safeguarding Team, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the learner or parent/carer alleging that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the learner making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve.
- For adult learners, inform the learner themselves; involve a carer or advocate only with consent or where the learner lacks capacity.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the member of staff alleging that the investigation is taking place and what the likely process will involve.
- Inform LearningPlus Advisory Board of the allegation and the investigation. The Director of Human Resources shall keep a written record of the action taken in connection with the allegation.

7.3.5. Suspension

Suspension should not be automatic. In respect of staff, other than the Managing Director or member of SMT suspension can only be carried out by the nominated member of the senior management team. In respect of SMT member suspension can only be carried out by the Managing Director.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where a learner is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, this will be conducted in accordance with the existing LearningPlus disciplinary procedures.

7.3.6. The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing LearningPlus disciplinary procedures.

7.3.7. Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept.

In consultation with the DSL, the Managing Director shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence. inform the parents/carers of those involved that the allegation has been made and of the outcome.
- Where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- In some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

7.4 Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about LearningPlus' statutory duty to notify the Disclosure and Barring Service. LearningPlus has a legal duty to refer to the DBS where it removes a person from regulated activity (or would have done so had they not left) because they harmed, or posed a risk of harm to, a child or adult. Safeguarding records are kept securely and separately from the main learner file, with a defined retention period in line with the Data Protection Policy.

7.5 Confidentiality

The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a learner from the same school or college (where that identification would identify the teacher as the subject of the allegation). LearningPlus will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will only be shared on a need-to-know basis and in accordance with safeguarding, data protection and employment requirements. All parties involved will be treated fairly and with sensitivity throughout the process. Where allegations relate to staff, LearningPlus will seek appropriate advice and follow relevant statutory guidance and procedures.

8.0 Safer recruitment and selection procedures

(underpinned by the KCSIE 2026 Part 3 (as good practice) and DBS eligibility guidance)

LearningPlus has in place robust recruitment procedures which ensure that care is taken to protect young or vulnerable learners. The procedures apply to all staff and volunteers, and they are reviewed regularly to take account of following principles:

- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gaps.
- Identity and right-to-work checks before employment starts.

- The level of DBS check is decided for each role using DBS eligibility guidance and recorded with the reason; adults' barred list checks are only available for regulated activity with adults.
- Shortlisted candidates are told that online searches may be carried out.
- A single central record (SCR) of pre-employment checks is kept up to date. Ofsted checks the SCR early on the first day of inspection; minor administrative omissions can be corrected during inspection.

9.0 Teaching learners about safeguarding

LearningPlus will teach learners about safeguarding, including online risks, through teaching and learning opportunities as part of providing a broad and balanced curriculum. Learner inductions covers; What is safeguarding, who the team are and how to report concerns. Learners are able to access modules on Safeguarding, Prevent, British Values and Consent and Healthy Relationships and cover these topics at induction and throughout their learning.

Safeguarding is revisited in progress reviews. Ofsted inspectors speak to learners without staff present; safeguarding is likely to be judged "not met" if learners do not know how to report concerns or do not trust that concerns will be acted on. Learners are shown how to use the Moodle "Report a Safeguarding" button and are given information on mental health support, online safety (including scams, misinformation and AI-generated content) and healthy relationships. The learner resource "Safeguarding, Prevent, British Values and Online Safety" covers signs of abuse (including financial signs for adults), Prevent, British Values and how to check information before sharing it.

10.0 Dissemination

The DSL will ensure this policy is known and used appropriately:

- The policy will be reviewed annually, and whenever legislation or statutory guidance changes.
- The procedures and implementation will be updated and reviewed regularly.
- The policy will be available publicly and learners will be made aware of the fact that referrals about suspected abuse or neglect may be made and the role of LearningPlus
- Link with the Safeguarding Children Partnership and the Safeguarding Adults Boards in the areas where we deliver to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Should learners leave LearningPlus., if appropriate; their child protection or safeguarding file will be copied for any new college or training provider as soon as possible but transferred separately from the main learner file.

11.0 Links to other polices

This policy has links to the following policies and procedures:

- Staff Disciplinary Policy and Procedures
- Anti-bullying Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Safer Recruitment/DBS Policy
- Prevent Policy 2026-2027 and Prevent Duty Risk Assessment 2026-2027
- E-Safety and Acceptable Use of IT / AI Policy
- Mental Health and Wellbeing Policy
- Data Protection Policy
- Low-level Concerns and Staff Code of Conduct
- Sexual Harassment Prevention Policy (Worker Protection Act 2023)

12.0 Monitoring compliance with and the effectiveness of policy documents

12.1 Process for Monitoring Compliance and Effectiveness of Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

Termly: The safeguarding board will receive a report on safeguarding incidents and reports. The report will include numbers and types of concerns, referrals and outcomes, Prevent activity, training completion, filtering and monitoring alerts, and themes from learner voice.

Termly: The senior management team will receive a report from the safeguarding board on safeguarding incidents and reports.

Annually: The DSL and safeguarding board will review the safeguarding policy and produce a report that will be presented to the SMT and Managing Director.

Inspection readiness: under the Ofsted renewed inspection framework (from November 2025), safeguarding is judged "met" or "not met" first. Inspectors sample casework and referrals and look at whether the safeguarding culture is effective over time.

12.2 Process for Monitoring Compliance and Effectiveness of Dealing with Allegations Against a Member of Staff

Where an allegation has been made against a member of staff, the DSL and safeguarding board including the Managing Director and director of human resources, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the procedures and/or policies. Consideration should also be given to the training needs of staff.

Appendices

- A.1 – Safeguarding Statement
- A.2 – Designated Safeguarding Team
- A.3 – Safeguarding Referral Form
- A.4 – Safeguarding Flowchart
- A.5 – Protocol for reporting missing learners
- A.6 – Safeguarding away from the Group Premises
- A.7 – Safeguarding Guidelines for Work placements
- A.8 – Safeguarding Declaration
- A.9 – Additional Expert and Professional Guidance
- A.10 – Local adult safeguarding contacts (WMCA and SYMCA areas)
- A.11 – Mental health, self-harm and suicide: staff response

• A.1 – Safeguarding Statement

Safeguarding statement

LearningPlus is committed to protecting young people and adults at risk from harm.

As a Safe Organisation:

We ensure that all our employees are aware of their responsibilities to safeguarding children and adults at risk.

We do this by:

- Adopting safer recruitment practices of staff to work with young people and adults at risk.
- Clear expectations of staff about personal conduct and responsibility to promote the wellbeing of young people and adults at risk at all times.
- Good induction systems and ongoing training/updates for staff on safeguarding young people and adults at risk.
- Ensuring all staff have access to information and guidance on procedures for child protection and protection of adults at risk.
- A team of named managers trained to provide access to specialist advice on child protection and the protection of adults at risk.
- Sound data protection, information sharing and referral procedures.
- The promotion of a culture of safeguarding throughout the company.
- Listening to the concerns of young people and vulnerable adults with an open mind.
- Clear procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the company, including independent advice and referral to the police as necessary.
- Regular reporting of safeguarding incidents to the Senior Management Team.
- A clear and accessible complaints procedure where there are concerns to be raised.
- Working in a person-centred way that respects adult learners' wishes, in line with Making Safeguarding Personal.

• A.2 – Designated Safeguarding Team

The Safeguarding Board

Designated Safeguarding Lead (DSL)

Nic Parkinson (also Prevent Lead) – Nicola.Parkinson@peopleplus.co.uk; safeguarding@peopleplus.co.uk.

Out of Hours: https://the-waitingroom.org/

Deputy Designated Safeguarding Lead~~s~~ (DDSL~~s~~)

Maimuna (Mai) Omar (also Deputy Prevent Lead) – telephone: 07771 044 258; email: Maimuna.Omar@learningplus.co.uk

Designated Safeguarding Officers (DSOs)

Maimuna (Mai) Omar (Deputy DSL)

Cerys Browne – telephone: 07765 082 981; email: Cerys.Browne@learningplus.co.uk

Rob Johns: 0121 772 4551; email: rob.johns@learningplus.co.uk

Designated safeguarding mobile (held by the DSOs): 07503941250

Out of Hours: https://the-waitingroom.org/

Designated Senior Person (DSP)

Simon Bladon, Managing Director: 07810 313044

Email: simon.bladon@learningplus.co.uk

Out of Hours: https://the-waitingroom.org/

Deputy Designated Senior Person (DDSP); Independent Adviser, Scrutiny and Challenge ;

Advisory Board Safeguarding Specialist

Dr Dan Grant (Leaders in Safeguarding): 07843 049271

Email: dangrant@leadersinsafeguarding.com

Prevent Lead

Nic Parkinson (DSL), supported by Maimuna (Mai) Omar (Deputy DSL) as Deputy Prevent Lead.

Senior leads accountable for filtering and monitoring

Cerys Browne and Maimuna (Mai) Omar, with escalation to Nic Parkinson (DSL).

Mental Health First Aiders (MHFAs)

There are 17 Mental Health First Aiders across the group, including Michael Donnelly. Staff can talk confidentially to an MHFA through the group MHFA forum.

ACT (Action Counters Terrorism) and Martyn's Law representatives

Maimuna (Mai) Omar and Nic Parkinson.

Health and safety

Health and Safety Representative: Michael Donnelly. Group SHRAG and Health and Safety Manager: Bernie Campbell.

Office Hours

Our office hours are 09:00-17:00 Monday to Friday.

Out of Office

Out of hours please use the TWR Waiting Room where you will find Health & Wellbeing services. The Waiting Room is a signposting directory, not an emergency service. If anyone is in immediate danger call 999. For urgent mental health help call NHS 111 (option 2) or Samaritans on 116 123. Out-of-hours adult social care numbers are listed in Appendix A.10.

• A.3 – Safeguarding Referral Form

Significant event record form

Incident Record

Notifiable Event ☐ Date Recorded: ……

Major Incident ☐

Name of Individual: ……

Home Address: ……

……

Postcode: …… Local authority area where the individual lives: ……

Date of Birth: ……

Learner Number (if applicable): ……

Form Completed by: ……

The items below are known as notifiable events. In the first instance, your line manager needs to be informed. Your line manager will then inform the relevant member of the Senior Management Team, the Director, or Board Member. For any safeguarding or Prevent concern, inform the DSL on the same day (Appendix A.2).

Notifiable Events

Please tick appropriate boxes.

Absconding ☐ Damage to Property ☐ Restraint ☐

Bullying/Harassment ☐ Injury to Person ☐ Safeguarding Disclosure ☐

Criminal Offence ☐ Police Called ☐ Other ☐ Prevent / radicalisation concern ☐

If **other**, please state: ……

Does this event/incident relate to known behaviour?: ……

Date of event/incident: ……

Time of event/incident: ……

Details of the Event or Incident

Where did this event take place?: ……

What triggered this event?: ……

Was this a new trigger to those (if any) already known about? YES / NO

Names of Staff Members involved: ……

Names of Learners involved: ……

Names of any other witnesses: ……

What support was in place to meet the needs of the Learner(s) involved prior to event taking place?: ……

Online/digital context (platform(s), content, any known contacts): ……

Learner's views and wishes (what outcome do they want?): ……

Has the learner consented to the concern being shared? YES / NO If no, reason for sharing without consent: ……

Any concerns about the learner's mental capacity to make this decision? YES / NO Details: ……

Are any children or other adults at risk? YES / NO Details: ……

Provide Full and Factual Details Relating to the Event or Incident

What happened prior to the incident taking place?: ……

What happened during the incident?: ……

……

Were there any de-escalation techniques used? YES / NO

If **yes**, please explain: ……

How did the incident end?: ……

Name of Staff Member (please print): ……

By signing below I confirm that to the best of my knowledge these statements are true and an accurate representation of the facts as I believe them to be. (Please write this record in your own words; do not use AI tools.)

Signed: ……

Date: ……

Reflections and implementation of actions

To be completed with the supervision of a Manger, Team Leader, or Director.

What action has been taken after the incident?

Please tick appropriate boxes.

Advise staff to follow up with student ☐ Advise manager ☐

Contact parent/carer ☐ Contact support worker ☐

Accident form completed ☐ Review risk assessment ☐

CAF referral ☐ Safeguarding referral ☐

Adult social care referral ☐ Prevent referral ☐ Police ☐ Signposting / internal support ☐
No further action (rationale recorded) ☐

Other ☐ if **other**, please state: ……

DSL decision and rationale (including any decision not to refer): ……

What actions will be put in place to ensure this does not occur again?: ……

Have all actions been carried out? YES / NO

If **no**, please state the reason why: ……

Please state a date for follow-up: ……

Name of Staff Member completing form (please print): ……

Signed: ……

Date: ……

Return to a Manager / Team Leader / Director to sign off actions as complete.

Name of Manager (please print): ……

Signed: ……

Date: ……

Follow-up actions completed:

Date	Comments	Staff initials

• A.4 – Safeguarding Flowchart

Flowchart for dealing with concerns, suspicions, or disclosures of harm or abuse

Step one

You are concerned that a child, young person, or adult at risk has been abused because:

- You have seen something
- They have said they have been abused
- Somebody has told you they are concerned
- There has been an allegation against a member of staff
- There has been an anonymous allegation
- An adult has disclosed they are abusing a child or adult at risk
- An adult has disclosed they were abused as a child
- You are worried a learner may be being drawn into terrorism or extremism (follow the Prevent Policy)

If anyone is in immediate danger, call 999 first.

Step two

Talk to the Designated Safeguarding Lead (or the Deputy DSL (Maimuna Omar), or another Designated Safeguarding Officer, if the lead is unavailable) and record your concern on the incident reporting form or the Moodle "Report a Safeguarding" button on the same day. If the concern is about a member of the Safeguarding team, please report the concern to the Managing Director. Remember to include the date and time in your report, as well as your name, job role, and your signature.

Step three

- The Designated Safeguarding Lead (or the Deputy DSL (Maimuna Omar) if unavailable) will contact Children's or Adults Services and/or the local police if a crime is suspected to have be committed (call 101 if non-urgent, and call 999 in an emergency).
- The caller should say "I want to make a child protection referral" and – if ringing social care services – should ask to speak to the duty social worker. They may also be required to complete an online referral form to report this, which should be submitted on the same day. For an adult, say "I want to raise an adult safeguarding concern" to the adult social care front door for the area where the adult lives (Appendix A.10). Many areas require professionals to use an online form.
- On the incident form, they should record who was spoken to; if a referral was accepted or not (with reasons), along with any actions agreed (include the date and time, as well as your name, job role, and signature).
- All forms should then be stored securely in the designated locked filing cabinet or secure electronic system.

Notes

In cases of a concern about a member of staff or a learner, you should talk to the DSL. The LADO (Local Authority Designated Officer) or Adults Services will coordinate the next steps for any staff or learner in regulated activity complaints or allegations. For allegations about harm to adults, the local Safeguarding Adults Board "Person in a Position of Trust" (PiPoT) procedure applies. Anyone can 'whistle-blow' directly to the police, social services, or Ofsted if they feel their concerns will not be managed appropriately by the company. All media enquiries should be referred to the Managing Director. EVERYONE should observe confidentiality with colleagues, family, and friends.

• A.5 – Protocol for reporting missing learners

Protocol for reporting missing learners

LearningPlus recognises that adult learners have the right to make decisions about their attendance and engagement with learning. However, where there are safeguarding concerns about an adult learner's welfare, safety or whereabouts, appropriate action may be taken.

Examples may include concerns relating to self-harm, suicide, domestic abuse, exploitation, homelessness, modern slavery, radicalisation or other circumstances where the learner may be at risk of significant harm.

Where concerns arise and attempts to contact the learner have been unsuccessful, the Designated Safeguarding Lead may assess the level of risk and take appropriate action. This may include contacting the learner's nominated emergency contact rather than a parent/carer, in line with consent given at enrolment, making a safeguarding referral, requesting a welfare check from relevant agencies, or contacting the police where there is an immediate risk to life or safety.

Any action taken will be proportionate to the level of concern and recorded in accordance with safeguarding and data protection requirements.

Rationale

This protocol is designed to provide an effective response in the event of a learner going missing. This is an essential part of our responsibility to:

- Safeguard learners
- Ensure that there are no barriers to punctuality and attendance

Definition of 'Missing'

"Anyone whose whereabouts cannot be established will be considered missing until they are located and their wellbeing is confirmed." This definition is taken from the College of Policing Authorised Professional Practice for missing persons.

When Discovering that a Learner is Missing

Your first step should be to inform your line manager. The line manager should immediately:

- Find learner contact details and contact directly if possible – locate learner and arrange safe return to the centre or home.
- Liaise with the DSL to identify any possible safeguarding concerns and ensure appropriate contact is made.

If this is not possible (if no contact can be made), the manager should:

- Ascertain when the learner was last seen (keep a note of any witness statements including names and course details).
- Ascertain what course the learner is on and the timetable for that day.
- Establish if anyone knows where the learner intended to go.
- Searches, where appropriate, of relevant areas.
- Contact the parent/carer or emergency contact as appropriate (there should not be a long gap – parents/carers do not want to hear that their relative has been missing for several hours) and give the facts:
  - When the learner was last seen
  - How it was discovered that they were missing
  - What we have done so far

If there is cause for concern and in consultation with the parent/carer:

- Report to police or relevant authority (collect and record incident number)
- Ask the parent/carer to stay in touch if they hear anything
- Maintain contact with parent/carer until the learner is found (parents/carers need to know that we are doing everything in our power to find the learner).
- Report incident to Managing Director.

Investigation and Report Records

Identifying why a learner has gone missing can be a key part of reducing the likelihood of it happening again and safeguarding that learner. The learner needs to be spoken to about their actions and rationale and any risks they were exposed to. This conversation may reveal the need for ongoing additional support.

When the situation has been resolved the DSL should:

- Carry out a full investigation
- Establish why the situation occurred
- Work with the course tutor and parent/carer/learner support team if appropriate to establish a safe system of supervision in the future
- Provide a written report for the learner file (be aware of confidentiality and data protection)
- Ensure that a letter is written to the parent/carer, to confirm any new arrangements, including responsibilities to be assumed by external Parties.

Information Sharing

If there is a concern about a learner's safety or well-being it may be necessary to share information with other agencies. Their safety and well-being of the child must be the primary considerations when making such a decision.

Sharing of information must be in line with the confidentiality, data protection and human rights legislation and guidance. Information shared will need to be carefully recorded. In most circumstances consent from a parent/carer/learner would need to be gained to share information; however there are some circumstances in which sharing information without consent will be normally justified. These are:

- When there is evidence or reasonable cause to believe that a child is suffering, or is at risk of suffering significant harm; or
- When there is evidence or reasonable cause to believe that an adult is suffering, or is at risk of suffering, serious harm; or
- To prevent, detect or to support the prosecution of serious crime.
- Where the adult lacks capacity to consent, or is subject to coercion or undue influence (Care Act statutory guidance).

Police Response

Where a missing person report is made, the police have an obligation to take action, within their powers, to safeguard the rights of individuals who may be at risk. Those under 18 will not be considered 'low risk'. Where a missing person has been identified as high or medium risk, positive action becomes an obligation at every stage of the missing person investigation.

Useful Contacts

If you believe a learner is at immediate risk this should be reported without delay to the police service; for emergencies ring 999.

• A.6 – Safeguarding away from the Group Premises

Safeguarding outside of LearningPlus premises

Sections A.6 and A.7 remain within this policy to support any future delivery involving learners aged under 18. For adult learners, employers and placement providers are provided with safeguarding and Prevent information, are informed of how to raise concerns with LearningPlus, and are asked to complete the declaration at A.8 to confirm their understanding of these responsibilities.

Introduction

Any learner under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidance (Working Together to Safeguard Children 2023, Incidents of child abuse are not common but any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or college, in the work place or in some other place.

Child abuse can take many forms, but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that children and young people are protected from any form of harm.

Guidance

Schools, colleges and training providers organising work placements and other activities must ensure that policies and procedures are in place to protect children and young people from harm, focusing greatest emphasis on settings in which children may be most at risk, for example where children will be placed for long periods in one-to-one situation with an adult.

These can be considered where the placement is as follows:

- For more than one day a week
- For longer than one term per academic year
- Aimed at those children who may be vulnerable e.g.: those who are aged under 16 or have special needs
- Where the workplace supervisor or colleague will have substantial unsupervised access to the child, because of the nature of the business
- Long-term extended work placements must include arrangements for DBS Disclosures for example when Young Apprentices are in a placement.

It is essential that the key supervisor of the learner, if not under the direct responsibility of a member of LearningPlus staff, is aware of their responsibilities with respect to child protection.

• A.7 – Safeguarding Guidelines for Work placements

Safeguarding guidelines for work placements

Schools, colleges and training providers organising work placements must ensure that policies and procedures are in place to protect children and young people from harm.

It is essential that the key supervisor of the learner is aware of the procedures in place to ensure the safety of the young person.

Introduction

Any young person under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidelines (Working Together to Safeguard Children 2023).

Incidents of child abuse are not common BUT any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or College, in the workplace or in some other place.

Child abuse can take many forms, but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that young people are protected from harm.

Procedure

1. All complaints, allegations or suspicions of abuse must be taken seriously.

2. If an allegation is made that a learner has been abused or if there is a suspicion that a student has been abused this should be reported to the student's college supervising member of staff immediately. If the learner's college supervisor is not available, please contact one of the DSL immediately.

3. Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured.

4. If the complainant is the learner, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and any following court proceedings.

5. A full record shall be made as soon as possible of the nature of the allegation and any other relevant information including:

- The date
- The time
- The place where the alleged abuse happened
- Your name and the names of other present
- The name of the complainant and, where different, the name of the student who has allegedly been abused
- The nature of the alleged abuse
- A description of any injuries observed
- The account which has been given of the allegation that should be signed and dated by the person completing the report

Please note: Some learners with learning disabilities may need different treatment to others e.g. in the way their physical/mental condition might mask possible abuse.

Apprentices

- Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding.
- Placement Officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with students.
- Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details.
- When dealing with a disclosure, follow referral procedure as per Section 7
- Work placements will sign and return the safeguarding declaration to LearningPlus
- Employers receive a Prevent briefing (DfE "Work-based learners and the Prevent statutory duty") and know how to raise a Prevent concern with LearningPlus.

• A.8 – Safeguarding Declaration

Safeguarding declaration

To be completed and returned to LearningPlus, with a copy to be retained by the supervisor at the specified organisation.

Workplace placement details	
Name of Organisation:	
Address of Organisation:	
Telephone No.:	
I confirm that I have read and understood the guidelines and procedures contained within the attached document , including the Prevent duty briefing. I also understand my responsibilities as the Placement Supervisor.	
Placement Supervisor Name (please print):	
Placement Supervisor Signature:	
Date:	
I confirm that I have explained LearningPlus' Safeguarding Policy to the above- named supervisor and that they are aware of the procedures to follow if they are concerned about the welfare of a young person or adult learner.	
LearningPlus Representative Name (please print):	
LearningPlus Representative Signature:	

Workplace placement details	
Date:	

E-Safety policy and procedure

1.0 All online safeguarding concerns will be dealt with in line with this policy, particularly in terms of referral and recording procedures

2.0 All members of staff will be advised of the company's IT Acceptable User Policy (AUP) policy and will agree to adhere to it.

3.0 The prevalence of issues arising through children's access to the online world is significant and all staff should be aware of associated risks and signs/symptoms. LearningPlus has appropriate filters and monitoring systems in place which are reviewed regularly to ensure that staff and students are safe when online. The breadth of issues classified within online safety is considerable, but can be categorised These are categorised within KCSIE 2026 as:

• **content:** being exposed to illegal, inappropriate or harmful content; for example, pornography, racism, misogyny, self-harm, suicide, Antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

• **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 for sexual, criminal, financial or other purposes.

• **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-This includes non-age-appropriate content, self-harm and suicide, sexting, cyberbullying, grooming, radicalisation and gaming (now identified by the World Health Organisation as a disorder)

• **commerce**: risks such as online gambling, inappropriate advertising, phishing and financial scams.

KCSIE 2025 makes specific reference to keeping children safe online including when they are online at home. This is partly in response to the significant impact of COVID-19 in relation to children's use of the online world and the challenges as a result.

The use of technology has become a significant component of many safeguarding issues. LearningPlus takes online safety very seriously by educating staff and in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

• unauthorised access to computers (illegal 'hacking'), for example accessing a college's computer network to look for test paper answers or change grades awarded;

• denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Filtering & Monitoring

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and students and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Technology, and risks and harms related to it, evolve, and change rapidly. The organisation reviews their approach to online safety at least annually and this is discussed at the termly Filtering & Monitoring Committee meetings

LearningPlus does everything they reasonably can to limit children's exposure to risks from the college's IT system. As part of this process, the college ensures they have appropriate filtering and monitoring systems in place and regularly review their effectiveness. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

• Identify and assign roles and responsibilities to manage filtering and monitoring systems. At LearningPlus the senior leads are Cerys Browne and Maimuna (Mai) Omar, with escalation to Nic Parkinson (DSL); the IT Department manages the systems day to day and passes alerts to these leads within 24 hours.

• Review filtering and monitoring provision at least annually. (KCSIE 2026: at least once every academic year, with a written record of the review.)

• Block harmful and inappropriate content without unreasonably impacting teaching and learning.

• Have effective monitoring strategies in place that meet their safeguarding needs

Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: "appropriate" filtering and monitoring. https://www.saferinternet.org.uk/advicecentre/teachers-and-schoolstaff/appropriate-filtering-and-monit

Artificial intelligence (AI). Where LearningPlus or its learners use generative AI tools, LearningPlus follows the DfE "Generative AI: product safety expectations" as good practice, and the DfE cyber security standards. Ofsted inspectors may ask how any AI use is monitored and checked so that it is accurate, safe and used in learners' best interests. Staff must not enter learners' personal or safeguarding information into AI tools and must not use AI to write safeguarding or Prevent records.

Staff may become concerned about children, young people and adults at risk if they are:

- Accessing illegal websites or inappropriate "lifestyle" or for their age and ability.
- Receiving unwanted or upsetting text or e-mail messages or images.
- Being "groomed" by a responsible adult with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs, radicalisation, or criminal activity.
- Viewing or receiving socially unacceptable material such as inciting hatred or violence.
- Sending or receiving bullying messages or posting malicious details about others.
- Scamming for financial gain.
- Ignoring copyright law by downloading music videos.
- Becoming secretive about where they are going or who they are meeting.
- Secretive about what they are accessing online.
- Using a phone, iPad or tablet in a closed area, away from other people.
- Accessing the web or using a handheld device for long periods and at all hours.
- Constantly clearing their browsing history.
- Receiving unexpected money or gifts from people they meet online.
- Sending sexually inappropriate images of themselves to others (i.e. "sexting") which, for under 18-year-olds, is an offence under the Sexual Offences Act 2003.

- Showing fascination with mass-casualty attacks, weapons or explosives, or engaging with extremist, incel or "manosphere" content online (see Prevent Policy).

4.0 Staff may become concerned about a member of staff who:

- Befriends or communicates with learners who they work with, especially by their personal phone, online, by messaging and social media etc.
- Is secretive about what they are doing and who they are meeting.
- Takes images of company activities with their own phone, iPad, or tablet without permission of their line manager.
- Does not seek parental permission for taking images of children and young people under 18 years of age. For adult learners, consent is obtained from the learner.
- Constantly clearing their browser history.
- Is viewing pornography at work.
- Is viewing child sexual abuse images at any time.
- Is promoting discrimination, illegal acts, or racial or religious hatred of any kind.
- Sharing confidential or sensitive information.
- Circulating or messaging any information which may be offensive.

E-Safety Referral Flowchart

Illegal content or activity is found or suspected.

Is a child or adult at risk in imminent danger?	Is your concern about child sexual abuse images from anywhere in the world OR about racial hatred content in the UK?	Is your concern about an unknown person communicating with a child or adult at risk for sexual reasons?	Is your concern about a known person, non-sexual harassment, or other potential crime? (For extremist or terrorist content, follow the Prevent Policy and report at gov.uk/report-terrorism.)
Dial 999 immediately.	Your DSL or DDSL will contact the Internet Watch Foundation www.IWF.org.uk	Your DSL or DDSL will contact CEOP www.CEOP.gov.uk (CEOP is for concerns involving children; for adults, report to the police)	Your DSL or DDSL will contact your local police (Tel.: 101)

Liaise as necessary and await a response. The company will review its E-Safety arrangements.

Consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff ar at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/) . Suspicious emails can also be forwarded to the National Cyber Security Centre's

Suspicious Email Reporting Service at report@phishing.gov.uk. Cyber incidents affecting LearningPlus systems can be reported to the National Cyber Security Centre at report.ncsc.gov.uk.

• A.9 – Additional Expert and Professional Guidance

Additional expert and professional guidance

Further expert and professional guidance and practical support on specific safeguarding issues can be accessed via the www.gov.uk website as follows:

- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking
- Adult safeguarding (Care Act 2014 statutory guidance)
- Modern slavery
- Fraud and scams

In addition to the above, information can be found on the NSPCC website www.nspcc.org.uk

Safeguarding Children Partnership Guidance

If we are worried that a child, young person or adult is at risk of abuse, harm or neglect, please call 999 and ask for the police. They will put you in touch with the safeguarding professionals in the area where the incident is said to have taken place.

If a member of the Safeguarding team cannot be contacted (for example out of hours) NSPCC, Childline or the local Safeguarding team in your area provide a safeguarding advice and support service.

NSPCC 24 hours 7 days per week – Telephone: 0808 800 5000

www.nspcc.org.uk

Child line 24 hours 7 days per week – Telephone: 0800 1111

www.childline.org.uk

Support services for adults

National Domestic Abuse Helpline (24 hours): 0808 2000 247

Modern Slavery Helpline (24 hours): 08000 121 700

Samaritans (24 hours): 116 123

NHS 111, option 2 – urgent mental health support (England)

Shout crisis text service: text SHOUT to 85258

Forced Marriage Unit: 020 7008 0151

Anti-Terrorist Hotline: 0800 789 321; ACT Early Support Line: 0800 011 3764

• A.10 – Local adult safeguarding contacts (WMCA and SYMCA areas)

Local adult safeguarding contacts

Raise an adult safeguarding concern with the local authority where the **adult lives**. Contacts were checked on official council or Safeguarding Adults Board websites between September and November 2026; most pages were undated. [Reviewer: verify every number before publication and record a "last checked" date at each termly review.] In an emergency always call 999.

Local authority	Report an adult safeguarding concern	Out of hours	Notes
Birmingham	0121 303 1234; CSAdultSocialCare@birmingham.gov.uk; online form	0121 464 9001	0121 675 4806 is the Emergency Duty Team (listed for children's out-of-hours in the LearningPlus Birmingham contacts sheet 2026) – confirm which line covers adults out of hours
Coventry	Adult Social Care Direct 024 7683 3003; ascdirect@coventry.gov.uk	024 7683 2222	
Dudley	Online "Tell us" form; Adults Front of House 0300 555 0055	0300 555 8574	
Sandwell	0121 569 7474 (option 4); ASC_Connect@sandwell.gov.uk; professionals use the online portal	0121 569 2355	Conflict: SAB page lists 0121 569 2266 – check
Solihull	Online form; 0121 704 8007; ccadults@solihull.gov.uk	0121 605 6060	
Walsall	0300 555 2922; initialintake@walsall.gov.uk	Not confirmed	
Wolverhampton	Online adult referral form (E-MARF); 01902 551199	01902 552999	
Sheffield	0114 273 4908 (24/7); professionals via Sheffield Adult Safeguarding Partnership website	Same line	
Barnsley	01226 773300 (Mon–Fri, 9–5)	01226 774466	Conflict: some sites give 01226 787789 – check
Doncaster	Online adult abuse report form; SAH@doncaster.gov.uk; advice 01302 737063	01302 796000	
Rotherham	01709 822330; online "Report abuse of an adult" form (Rotherham SAB)	Not confirmed	

For concerns about a **child**, contact children's social care for the area where the child lives, or the police.

Birmingham – children's safeguarding, LADO, Prevent and Channel (source: LearningPlus Birmingham contacts sheet, 2026)

Service	Contact
Children's Advice and Support Service (CASS)	0121 303 1888
Emergency Duty Team (out of hours)	0121 675 4806
LADO (allegations about adults who work or volunteer with children)	Via Birmingham Safeguarding Children Partnership: 0121 464 2612; BSCP.ContactUs@birminghamchildrenstrust.co.uk; PO Box 16616, Birmingham, B2 2HN
Birmingham Prevent Team	prevent@birmingham.gov.uk; Prevent Manager/Co-ordinator: Sean Arbuthnot
Channel Panel	Submit a Prevent referral through the Birmingham Prevent process; cases meeting the threshold may be considered by the Channel Panel
National Prevent advice (ACT Early Support Line)	0800 011 3764; actearly.uk

• A.11 – Mental health, self-harm and suicide: staff response

Mental health, self-harm and suicide: staff response

Ofsted's FE and skills toolkit (September 2026) expects providers to identify learners at risk of harm from mental health issues developing into safeguarding concerns, such as eating disorders, self-harm or suicidal ideation. Staff are not expected to be mental health professionals, but must know how to respond.

If a learner is at immediate risk

- Call 999 (or take the learner to A&E if safe to do so). Do not leave them alone if they are at immediate risk.
- Inform the DSL as soon as it is safe to do so.

If a learner tells you they are struggling or having thoughts of suicide or self-harm

- Listen calmly and without judgement. It is safe to ask directly about suicide; asking does not put the idea in someone's head.
- Do not promise confidentiality. Explain you need to share the concern with the DSL to get them support.
- Inform the DSL on the same day and record the concern (Appendix A.3 or the Moodle "Report a Safeguarding" button).
- Signpost to support: their GP; NHS 111 option 2; Samaritans 116 123; text SHOUT to 85258; The Waiting Room app for local services.

The DSL will

- Agree a support plan with the learner (with their consent where possible), including any reasonable adjustments to learning.
- Refer to adult social care, the crisis team or police where there is risk of serious harm, recording the reason if sharing without consent.
- Check in with the learner and review the plan, and consider support for staff involved. Staff can talk confidentially to one of the group's 17 Mental Health First Aiders through the MHFA forum.

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