



Safeguarding Policy

Version 8 - September 2026

Document Control

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Version Control

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Review Dates

Policy will be reviewed on an annual basis.

Linked Policies

Safer Recruitment Policy – May 2026
Equal Ops Policy – September 2026
Health & Safety Policy – September 2026
Disciplinary Policy – Oct 2026
Data Protection Policy – Juen 2026

Person Responsible for the Policy

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Tony Higgins

Signature

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1. Policy Statement

Purpose and scope

All providers of adult, community and work-based learning in England have responsibilities to safeguard children, young people and adults at risk who use their services. As a provider of education and training, System People is committed to ensuring that learners are kept safe so that they can learn and thrive.

A child is anyone who has not yet reached their 18th birthday. Reaching the age of 16, living independently or participating in further education does not change a child's status or entitlement to protection.

Safeguarding describes the preventative and protective arrangements required to protect children, young people and adults at risk from abuse, neglect, exploitation and other forms of harm, whether these occur at home, in the community, at work, in education or online.

Keeping Children Safe in Education 2026 (KCSIE 2026) comes into force on 1 September 2026. The shorter Annex A version of Part One has been removed. All staff should therefore read Part One of KCSIE 2026. The DfE's Part One overview may be used as a quick-reference aid but does not replace Part One.

System People applies the principles of KCSIE, Working Together to Safeguard Children and relevant adult safeguarding legislation to its apprenticeship and training provision. Where learners are employed in schools, colleges or other education settings, staff must also work in accordance with the safeguarding arrangements of the learner's employer and relevant local safeguarding partnership.

Safeguarding principles

- Safeguarding is everyone's responsibility.
- The welfare and best interests of the child are paramount.
- Concerns should be identified and acted upon as early as possible.
- No single practitioner will hold the full picture; effective safeguarding depends on appropriate information sharing and partnership working.
- Children and adults at risk should be listened to and treated with dignity and respect.
- Safeguarding concerns must never be ignored because they appear minor in isolation. Patterns, changes in behaviour and overlapping risks should be considered.

Recognition, Response, Report, Recording and Referral

Recognition: Staff must be able to recognise behaviour, indicators or circumstances that may suggest abuse, neglect, exploitation or other safeguarding harm. Children may not feel ready or know how to tell someone what is happening, and staff should remain professionally curious.

Response: Listen carefully, remain calm, do not promise confidentiality, do not ask leading questions and reassure the learner that they have done the right thing by speaking.

Report: Concerns must be reported without delay through the company's safeguarding reporting arrangements. If there is an immediate risk of serious harm must be escalated urgently to emergency/statutory services as appropriate.

Recording: Records must be factual, clear, dated and timed. Record the learner's own words wherever possible and distinguish fact, observation, professional opinion and information received from others.

Referral: The DSL or deputy will assess the concern and determine the appropriate action, including Family Help, children's social care, adult safeguarding, police, Prevent/Channel, LADO or other specialist support as appropriate.

2. Safeguarding Strategy

System People is committed to maintaining high standards of safeguarding across the company and to embedding safeguarding within strategic planning, curriculum, employer engagement, learner support, quality assurance and staff development.

Aims of the Safeguarding Strategy

- Ensure that all staff understand that safeguarding is everyone's responsibility.
- Keep children, young people and adults at risk safe.
- Provide help and support as soon as concerns emerge.
- Protect children from maltreatment and harm inside or outside the home, including online.
- Work effectively with employers, families where appropriate, local authorities, safeguarding partners and specialist agencies.
- Recognise the additional barriers and vulnerabilities that may affect children with SEND, relevant medical conditions, young carers, children experiencing mental health difficulties, and children who are lesbian, gay, bisexual or questioning their gender.
- Recognise that safeguarding issues frequently overlap, including abuse, neglect, exploitation, modern slavery, serious violence, domestic abuse and online harm.

Early Help and Family Help

Staff should understand the distinction between universal/community-based Early Help and the targeted early-help level of Family Help. Staff must be aware of local thresholds and referral routes and should speak to the DSL where a learner may benefit from coordinated Family Help or statutory children's social care.

Filtering, monitoring and online safety

Learners access company systems and learning platforms through secure, password-protected arrangements. Online safety is addressed through curriculum content, safeguarding updates and staff training.

The effectiveness of filtering and monitoring arrangements should be reviewed at least annually by the responsible senior leader, supported by the DSL and IT support. Checks should consider all relevant internet-connected devices and locations, and records of checks and actions should be retained.

Online safety arrangements must take account of generative AI, AI-generated content, deepfakes/deep nudes, manipulation of images, misinformation, inappropriate content and risks arising from the use or disclosure of personal information.

Cyber Security

- Protect sensitive personal information from compromise.
- Reduce the risk of significant data breaches.
- Protect learners, staff and the organisation from phishing, fraud, scams and malicious online activity.
- Maintain appropriate cyber-security controls and staff awareness.

Leadership and Management

- Safeguarding is embedded within strategic and operational planning.
- Safeguarding policies and procedures are reviewed at least annually and when statutory

guidance changes.

- Job descriptions identify safeguarding responsibilities.
- Staff receive appropriate induction, training and regular updates.
- Employer safeguarding arrangements are reviewed and concerns escalated where necessary.
- Robust DSL cover arrangements are maintained whenever the DSL is unavailable, with a reliable confidential route for urgent safeguarding information.

Safer Recruitment

System People operates safer recruitment arrangements designed to ensure that staff, volunteers and others engaged in regulated activity are suitable to work with learners. Appropriate identity, employment, reference, qualification, right-to-work and DBS/barred-list checks are undertaken according to the role and legal requirements.

KCSIE 2026 reflects changes to regulated activity following the Crime and Policing Act 2026, including removal of the previous supervision exemption. Volunteer and regulated-activity decisions must therefore be made using the current DBS/KCSIE requirements rather than relying on supervision alone.

Safeguarding responsibilities also apply to concerns involving supply staff, contractors and trainee teachers. Clear arrangements must be in place for reporting and managing allegations or low-level concerns involving these groups.

3. Radicalisation and Extremism

System People recognises the Prevent duty as part of its wider safeguarding responsibilities. Staff should be alert to changes in behaviour, relationships, language, online activity or circumstances that may indicate vulnerability to radicalisation or extremist influence. Concerns should be reported to the DSL. The DSL will consider the learner's wider needs and determine whether support, safeguarding referral or a Prevent/Channel referral is appropriate.

Information sharing in relation to Channel should follow current statutory expectations. Relevant information may need to be shared with police and safeguarding partners where this is necessary and proportionate to protect a child or other person from harm.

4. Roles and Responsibilities

- The Management Team has overall responsibility for implementing and monitoring safeguarding arrangements.
- The Managing Director is responsible for ensuring appropriate policies, strategies and operating procedures are maintained.
- The Designated Safeguarding Lead (DSL) provides advice and support, coordinates safeguarding action and liaises with statutory and specialist services.
- Deputy DSLs support the DSL and provide appropriate cover.
- The Quality and Compliance team reviews safeguarding documentation and monitors implementation.
- Delivery and operational staff are responsible for applying safeguarding standards within their provision and reporting concerns promptly.
- All staff must understand the reporting route for concerns about learners and concerns or allegations about adults working with children.

Designated Safeguarding Leads: Sarah Taylor, Liza Ewing and Jayne Lillington (reporting to Tony Higgins).

5. Reporting Procedure

No member of staff should conduct their own safeguarding investigation. Staff should listen, record and report. The DSL/deputy will determine the appropriate next steps and seek advice from statutory agencies where required.

Allegations against a person who works with children that meet the harm threshold should be referred to the relevant Local Authority Designated Officer (LADO) in accordance with local procedures.

Concerns may relate to employees, agency/supply staff, contractors, sub-contractors, volunteers or trainee teachers. The organisation and any third-party employer/provider must have clear arrangements for sharing information and deciding who will lead the response. Low-level concerns that do not meet the harm threshold must still be reported and managed in accordance with the company's low-level concerns/safer working practice arrangements.

Safeguarding concerns can be reported through the company's safeguarding reporting route and dedicated safeguarding contact arrangements.

5. Key Guidance and Legislation

- Children Act 1989 and Children Act 2004
- Children and Social Work Act 2017
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children - current statutory guidance
- Keeping Children Safe in Education 2026 - effective from 1 September 2026
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Data (Use and Access) Act 2025
- Crime and Policing Act 2026 - relevant changes to regulated activity
- Voyeurism (Offences) Act 2019
- Homelessness Reduction Act 2017
- Benedict's Law

6. Forms of Abuse, Neglect and Exploitation

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates or induces illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on emotional development. It can include conveying that a child is worthless or unloved, imposing inappropriate expectations, overprotection, preventing normal social interaction, serious bullying or seeing/hearing the ill-treatment of another.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child understands what is happening. It can involve contact and non-contact activity, sexual images, online activity and encouraging children to behave in sexually inappropriate ways.

KCSIE provides clearer information on sexual abuse, harmful sexual behaviour and sexual violence. Safeguarding responses should recognise a continuum of behaviour and consider the needs and safety of both the victim and alleged perpetrator.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in serious impairment of health or development. It may include failure to provide food, shelter, clothing, supervision, medical care or emotional responsiveness.

Child-on-child abuse, including harassment and violence

Child-on-child abuse can include bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, abuse within intimate relationships, upskirting, consensual or non-consensual sharing of nude/semi-nude images, initiation/hazing and serious violence or threats involving weapons. It is a safeguarding issue for both the victim and alleged perpetrator and should never be dismissed as banter or an inevitable part of growing up.

Staff should be alert to prejudicial and discriminatory behaviour, including misogyny and misandry, and to patterns of behaviour that may indicate escalating risk.

Nudes, semi-nudes and AI-generated imagery

Nude or semi-nude imagery may be self-generated, created or taken by another person, digitally altered, or wholly generated using artificial intelligence. This includes deepfakes and 'deep nudes'. Any incident involving the creation or sharing of such imagery involving a child requires a safeguarding response.

Child Criminal Exploitation and Child Sexual Exploitation

CCE and CSE occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. Exploitation can occur even where the activity appears consensual and may involve threats, violence, organised networks, gangs, trafficking or county lines.

Staff should recognise links between exploitation, coercion and modern slavery and understand that exploited children may be treated as offenders for actions undertaken under coercion. Safeguarding needs must be considered alongside any criminal justice response.

Modern Slavery

Modern slavery can include trafficking, forced labour, criminal exploitation, sexual exploitation and other situations in which a person is controlled or exploited for another's benefit. Concerns about a child who may have been trafficked or exploited should be reported immediately to the DSL, who will consider statutory safeguarding and National Referral Mechanism processes.

Domestic Abuse

Domestic abuse can be psychological, physical, sexual, financial or emotional. Children may experience domestic abuse directly or through seeing, hearing or experiencing its effects. This can have a significant impact on safety, wellbeing, behaviour, attendance and development.

Staff should be aware of current Operation Encompass arrangements and any notifications received through local safeguarding partnerships.

Mental Health

Mental health difficulties may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected to diagnose mental health conditions, but should report safeguarding concerns and support access to appropriate help where changes in

presentation, behaviour or wellbeing give cause for concern.

Serious Violence

Staff should be alert to indicators of serious violence, including increased absence, changes in friendship groups, unexplained gifts or money, decline in performance, signs of assault or self-harm, association with gangs or exploitation, and threats or possession of weapons.

Children with SEND or medical conditions

Children with SEND or relevant medical conditions can face additional safeguarding barriers. Indicators of abuse may be mistakenly attributed to disability, communication difficulties or behaviour. Staff should consider the need for reasonable adjustments, accessible communication and professional curiosity.

Young Carers

Young carers may experience additional pressures, absence, tiredness, isolation or reduced access to education and support. Staff should consider whether caring responsibilities indicate a need for Family Help or other safeguarding/welfare support.

LGB and gender-questioning children

Children who are lesbian, gay, bisexual or questioning their gender may be vulnerable to bullying, abuse or social isolation. Responses must be child-centred, sensitive and individualised, with safeguarding and welfare considerations informing decisions and information sharing.

Children absent or missing from education

Absence or missing education can be a warning sign of safeguarding concerns, including abuse, neglect, exploitation, criminal exploitation, sexual exploitation, domestic abuse or serious violence. Unexplained or repeated absence should be followed up and escalated in accordance with company and employer procedures.

7. Staff Responsibilities and Training

All staff receive safeguarding information during induction and appropriate safeguarding training thereafter, with regular updates so that knowledge remains current.

All staff should read Part One of KCSIE 2026. The DfE Part One overview can support recall but is not a substitute for Part One.

- how to recognise abuse, neglect, exploitation, modern slavery and online harm
- child-on-child abuse, sexual harassment, harmful sexual behaviour and serious violence
- online safety, filtering and monitoring, generative AI, deepfakes and AI-generated imagery
- mental health as a potential safeguarding indicator
- additional safeguarding barriers affecting SEND, medical conditions and young carers
- Prevent and Channel
- how to report concerns about learners and adults, including low-level concerns
- information sharing, confidentiality and accurate record keeping

DSLs and deputies should undertake appropriate safeguarding training and maintain knowledge through regular updates, inter-agency learning and review of local safeguarding arrangements.

8. Recording, Sharing of Information and Consent Issues

Effective safeguarding depends on relevant information being shared at the right time with those who need it. Data protection law does not prevent the sharing of information for safeguarding purposes when sharing is necessary, proportionate and lawful.

Consent should normally be considered where appropriate, but it is not required where seeking consent would place a child at greater risk, prejudice an investigation, place another person at risk, or where another lawful basis permits or requires information sharing.

Decisions about information sharing should be informed by a proportionate risk assessment. Staff should consider what information is necessary, why it is being shared, with whom, and the potential risks of sharing or not sharing it. The Data (Use and Access) Act 2025 should be considered alongside the Data Protection Act 2018 and UK GDPR.

Safeguarding records should clearly distinguish current concerns, professional opinion and historic information. Where safeguarding information is transferred, the receiving organisation should be provided with a clear, structured summary of current concerns, relevant context and ongoing support needs, alongside the safeguarding file as appropriate.

10. Online Training Delivery

- Use secure, approved platforms and appropriate security settings.
- Maintain professional boundaries, language, dress and backgrounds.
- Use company-approved communication routes and avoid exchanging personal contact details.
- Ensure appropriate arrangements for recording sessions and obtaining consent where required.
- Consider learner privacy, screen fatigue and health and safety.
- Report safeguarding concerns arising during online delivery through the normal safeguarding procedure.

Online delivery procedures should explicitly consider generative AI, AI-generated or manipulated images, deepfakes, inappropriate sharing of personal data, scams, fraud, misinformation and the use of mobile devices during learning.

11. Safeguarding Guidance

Good practice

- Work in open and observable environments wherever possible.
- Treat learners with respect and dignity and maintain professional boundaries.
- Use approved communication channels.
- Be aware of the impact of words, actions and digital communications.
- Ensure employers and work-experience providers understand safeguarding responsibilities.
- Be professionally curious and report concerns even where information is incomplete.
- Consider the child's voice and what is in their best interests.

Practices to avoid

- Promising confidentiality.
- Conducting your own investigation.
- Using personal social media or personal contact details to communicate with learners.
- Dismissive language about child-on-child abuse, harassment or harmful sexual behaviour.
- Creating, requesting, forwarding or storing inappropriate images of children.
- Entering information about identifiable learners into unapproved generative AI systems.
- 12. Other Relevant Policies
- Safer Recruitment
- Equality and Diversity
- Health and Safety
- Whistleblowing
- Disciplinary Procedures
- Data Protection and GDPR

- Online Safety / Acceptable Use
- Low-Level Concerns / Staff Code of Conduct

13. Monitoring

The Senior Management Team will monitor implementation of this policy. Safeguarding will be reviewed through quality assurance, learner and employer feedback, staff training, safeguarding records, employer reviews, observations and internal audit.

The policy will be amended when legislation, statutory guidance, local safeguarding arrangements or identified risks change.

14. Review Date

Review by: August 2027

Review responsibility: Managing Director/General Manager and Designated Safeguarding Lead

Appendix A - Safeguarding Children/Vulnerable Adult Incident Record

Your name:	
Your position:	
Child/vulnerable adult's name:	
Date of birth:	
Address:	
Parent/carer details (where relevant):	
Date and time of incident/disclosure:	
Exactly what the child/vulnerable adult said and what you said:	
Your observations:	
Witnesses:	
Action taken so far:	
External agencies contacted/advice received:	
Print name / signature / date:	

Appendix B - Safeguarding Children & Vulnerable Adults Flowchart

1. Learner makes a disclosure / staff member identifies a concern.
2. Listen, take the concern seriously, do not investigate or promise confidentiality.
3. Record the concern accurately and report it without delay to the DSL/deputy using the company reporting route.
4. DSL/deputy assesses risk and need, considers the learner's wishes and best interests, and decides the appropriate action.
5. Where required, refer to Family Help, children's social care, adult safeguarding, police, LADO, Prevent/Channel or other specialist support.
6. Record decisions, rationale, actions and outcomes. Continue to monitor and support the learner.

Appendix C - Safeguarding information for all staff

All staff should read Part One of Keeping Children Safe in Education 2026. The former shorter Annex A has been removed. The DfE Part One overview is a complementary quick-reference resource only.

- Safeguarding is everyone's responsibility and practice must be child-centred.
- Identify concerns early and report them promptly.
- Understand Family Help and local referral routes.
- Recognise abuse, neglect, exploitation, modern slavery, child-on-child abuse, sexual harassment, harmful sexual behaviour, serious violence and online harm.
- Be alert to additional vulnerabilities affecting SEND, medical conditions, young carers, mental health and children who are LGB or questioning their gender.
- Understand online risks including AI-generated imagery, deepfakes, scams, misinformation and unsafe contact.
- Share safeguarding information lawfully, proportionately and without unnecessary delay.
- Know how to report concerns about adults, including employees, volunteers, contractors, supply staff and trainee teachers.



**Keeping Children
Safe in Education 2026**

Appendix D - Online Safety - The Four Cs of Online Risk

1. Content

Harmful or inappropriate material, including sexual or violent content, extremism, misinformation, disinformation, hateful or discriminatory content, age-inappropriate material and AI-generated/manipulated content.

2. Contact

Grooming, coercion, exploitation, radicalisation, unsafe contact, impersonation and manipulative relationships through messaging, gaming, social media or AI-enabled services.

3. Conduct

Cyberbullying, harassment, sexualised behaviour, sharing nudes/semi-nudes, oversharing personal information, online hate, harmful challenges and misuse of AI to create or alter content.

4. Commerce

Scams, fraud, phishing, gambling-like features, in-app purchases, financial exploitation and targeted advertising.

Mobile phone and personal-device arrangements should be considered alongside safeguarding, behaviour, filtering/monitoring and online-safety expectations. Where learners are based in schools, staff should be aware of and follow the host setting's mobile phone policy.

