



Safeguarding Policy

Version 9

Directorate:	Poplar HARCA - Communities and Neighbourhoods Trust - Employment and Training Services
Validated by:	Tanzeem Ahmed

This Policy applies to the Employment and Training Services of the Community and Neighbourhood (CaN) Trust which is a subsidiary charity of Poplar HARCA. The policy will be reviewed on an annual basis. Poplar HARCA reserves the right to amend this policy, following consultation, where appropriate.

Date last updated:	November 2025
Date of next review:	November 2026

1. Introduction

All Poplar HARCA/CAN Trust staff, governing body members, associates, third-party providers, employers, and volunteers have a duty of care to safeguard and promote the welfare of all learners—both those attending work experience placements and those engaged in classroom or online learning.

Everyone working with learners, vulnerable adults, and their families must be familiar with this policy and their role in reporting any safeguarding concern to the relevant Local Safeguarding Partnership and through Poplar HARCA/CAN Trust internal reporting procedures.

This policy is available to learners and stakeholders at the initial point of engagement with Poplar HARCA/CAN Trust

In line with the Ofsted Education Inspection Framework (EIF), Poplar HARCA/CAN Trust ensure that arrangements for safeguarding are appropriate, effective, and fully embedded into the learning journey. We work closely with employers to ensure robust and consistent safeguarding systems are in place.

All staff must read and sign this policy, with records retained on staff files, confirming awareness of their responsibilities. Copies are also made available to learners and, where appropriate, their parents or carers.

Key statutory guidance includes:

[Keeping children safe in education 2025](#)

[Education inspection framework \(EIF\) - GOV.UK](#)

[Withdrawn Further education and skills inspection handbook.pdf](#)

2. What is Safeguarding?

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and enabling them to achieve the best possible life outcomes.

The safeguarding agenda includes a wide range of potential risks such as:

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Mental health abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Child- on-child abuse (formally peer on peer abuse before the revision in Sep 2022)
- Teenage Relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Missing children in education

3. Definitions

A Child is defined as anyone under the age of 18.

An adult at risk (or vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service in order to support their need
- Receiving a service due to their age or disability
- Living in residential accommodation as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mothers living in residential care
- Persons under supervision of the probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill or specific learning need
- Unsupportive home environment
- English not the first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need
- Social isolation

4. Our Responsibility

All staff have a duty to protect children, young people, and adults at risk from harm, to inform them about risks to their welfare, and to know how to seek help.

We ensure that all concerns are dealt with promptly and appropriately, and that risks of allegations against staff are minimised.

Relevant Staff are required to complete DBS checks and must understand what constitutes a safeguarding concern, how to report it, and how to support learners appropriately. Ongoing training, information, and guidance are provided to maintain confidence and compliance.

Roles and responsibilities:

Directors and Trustees: Ensure safeguarding training, adequate resourcing, compliance with KCSIE 2025, the Human Rights Act 1998, the Equality Act 2010, and local safeguarding partnership arrangements.

Designated Safeguarding Lead (DSL): Maintain partnership links, oversee reporting, training, and policy review.

Deputy DSL: Support DSL in all safeguarding functions.

Tutors/Trainers: Monitor learner welfare, identify and report concerns.

Support Team: Remain alert to indicators of risk and follow reporting procedures.

Further guidance:

NSPCC: [Types of Child Abuse & How to Prevent Them | NSPCC](#)

[Child abuse concerns: guide for practitioners - GOV.UK](#)

This policy should be read alongside related policies on Prevent, Health & Safety, Harassment and Bullying, and Safer Recruitment. In all cases, safeguarding takes precedence.

Directors and Trustees

Ensure that effective safeguarding policies and procedures are in place, implemented, and regularly reviewed.

Allocate sufficient time and resources for employees to fulfil their safeguarding responsibilities.

Receive appropriate safeguarding and child protection training at induction, refreshed at least annually, to provide strategic oversight and assurance of the effectiveness of safeguarding across Poplar HARCA/CAN Trust

Designated Safeguarding Lead (DSL)

Maintain links with **Local Safeguarding Partnerships** and **Prevent Coordinators**.

Inform and advise staff and partners of changes in safeguarding legislation, guidance, and current themes.

Poplar HARCA/CAN Trust employees to attend safeguarding training planned and delivered by Poplar HARCA.

Investigate, where appropriate, welfare concerns and liaise with external agencies, including safeguarding partnerships, the police, and local authorities.

Oversee reporting and escalation processes.

Manage safeguarding records and report to the Board on safeguarding matters and trends.

Review policies and procedures regularly and maintain their own CPD.

Deputy DSL

Support the DSL in all aspects of safeguarding leadership, ensuring continuity in the DSL's absence.

DSL: Community Training Manager Aledina Miah

- Aledina.miah@poplarharca.co.uk
- 07380204260

Deputy DSL: Assistant Director Tanzeem Ahmed

- Tanzeem.ahmed@poplarharca.co.uk
- 07957312780

Trainers and Tutors

Check learner safety and welfare during all sessions and communications.

Deliver safeguarding-related learning activities within programmes.

Be alert to potential safeguarding indicators and report concerns promptly using Poplar HARCA/CAN Trust reporting and decision chart.

Support Team

Remain vigilant to signs of abuse or neglect when interacting with learners or potential learners.

Follow Poplar HARCA/CAN Trust reporting procedure and decision chart when concerns arise.

5. Recognising Abuse

Abuse can take many forms, including:

- physical abuse
- Sexual abuse
- Emotional or psychological abuse
- Neglect

For further guidance, see:
[NSPCC – Types of Child Abuse](#)

In addition, vulnerable adults may experience:

- Financial or material abuse
- Self-neglect
- Domestic abuse

All complaints, allegations, and suspicions of abuse must be taken seriously. Any person receiving a disclosure must follow Poplar HARCA/CAN Trust safeguarding procedures and notify the DSL or Deputy DSL immediately.

Concerns involving non-staff members will be managed through Poplar HARCA/CAN Trust **incident management procedures**, though the police and safeguarding partners may still be involved.

For guidance on responding to concerns:

 [What to do if you're worried a child is being abused \(GOV.UK\)](#)

Safeguarding takes precedence over all other policies. Where issues overlap (e.g., Prevent, Health & Safety, Harassment, Bullying, Grievance), this policy must be followed.

Unsubstantiated or malicious allegations against staff will be managed in line with Poplar HARCA/CAN Trust **disciplinary policy**.

6. Safer Recruitment

Poplar HARCA/CAN Trust follows safer recruitment procedures in line with *Keeping Children Safe in Education 2025*.

A **Single Central Record** is maintained for all staff, detailing recruitment checks, including **DBS verification**, right to work, and qualifications.

Refer also refer to Poplar HARCA's recruitment procedure which is in line with safer recruitment procedures for further details.

All employees must read **at least Part 1 of KCSIE 2025** in conjunction with this policy.

Although Poplar HARCA/CAN Trust primarily serves adult learners, all staff and volunteers must also be familiar with policies relating to the safeguarding of children and young people.

Concerns that do not meet the harm threshold should be reported in accordance with the **Low-Level Concerns Procedure (KCSIE 2025, Part 4, Section 2)**.

7. Multi-Agency Working

Poplar HARCA/CAN Trust works in accordance with *Working Together to Safeguard Children (2023)* and the *Children and Social Work Act 2017*.

Safeguarding partners (local authorities, clinical commissioning groups, and police) share responsibility for coordinating safeguarding arrangements. The Hive Employment and Training recognises and engages with these local arrangements, ensuring that referrals, escalations, and information sharing are timely, accurate, and compliant.

8. Data Protection

Poplar HARCA/CAN Trust complies with the *Data Protection Act 2018* and the *UK General Data Protection Regulation (UK GDPR)*.

All personal information must be processed fairly, lawfully, and securely.

When sharing information for safeguarding purposes, staff should note that the **Data Protection Act 2018 permits sharing without consent** where it is necessary to protect a child or vulnerable adult.

Further

guidance:

 [Information Commissioner's Office – For Organisations](#)

Recording and Information Standards:

Be clear and accurate.

Record only relevant information, distinguishing between fact and opinion.

Include key details of the learner and a concise description of concerns.

Provide professional analysis where appropriate, outlining reasons for concern and potential risks.

Records form the basis of referrals and may be used in court reports or safeguarding investigations.

Internally, Poplar HARCA/CAN Trust requires an **update on the Safeguarding Incident Form (Part 3)** within seven (7) days of a disclosure, including a review of best practice and outcomes.

7. Role of the Designated Safeguarding Lead (DSL)

The **Designated Safeguarding Lead (DSL)** holds ultimate accountability for ensuring safeguarding arrangements for all learners, staff, and associates of Poplar HARCA/CAN Trust.

The DSL ensures that safeguarding remains central to Poplar HARCA/CAN Trust strategic management and that effective operational practices are in place across all delivery areas. The DSL must be an experienced and qualified safeguarding practitioner and a senior member of staff with appropriate authority and access to resources. (As stated in *KCSIE 2025*, the DSL should not be the proprietor.)

The DSL ensures that:

Safeguarding and child protection are embedded in all Poplar HARCA/CAN Trust activities.

Local staff maintain strong working relationships with **Local Safeguarding Partnerships (LSPs)** and other statutory agencies.

Staff receive appropriate safeguarding and Prevent training, updated regularly.

Safeguarding trends and outcomes are monitored and reported to the senior leadership team and Board.

Further role expectations are detailed in *Working Together to Safeguard Children (2023)*, Annex A.

[Working Together to Safeguard Children – GOV.UK](#)

Every staff member and volunteer is responsible for safeguarding learners while using Poplar HARCA/CAN Trust services and must follow internal reporting procedures.

Reporting and Internal Recording

All disclosures, regardless of outcome, must be reported internally through Poplar HARCA/CAN Trust **Safeguarding Incident Form**, which has three parts:

Part 1: Basic referral details

Part 2: Incident details (completed immediately after disclosure)

Part 3: Follow-up and outcome (completed within seven days of submission of Parts 1 and 2)

Once Parts 1 and 2 are complete, the document should be **anonymised, password-protected, and emailed securely to the DSL.**

The DSL will consult with the reporting staff member to determine whether a referral to the local authority is required and ensure all contractual reporting requirements are met.

8. Employer Responsibilities for Traineeship Learners

Employers hosting Poplar HARCA/CAN Trust learners must:

- Understand safeguarding and promote the welfare of learners.
- Be aware of statutory duties under safeguarding and equality legislation.
- Follow Poplar HARCA/CAN Trust reporting procedures for any concerns.
- Ensure employees working with learners are suitable, free from relevant convictions, and of good character and judgement.

Employers are expected to cooperate with Poplar HARCA/CAN Trust in implementing and maintaining a safe learning environment.

9. Responding to a Disclosure

If a learner discloses information:

- **Reassure** them that they did the right thing by speaking up.
- **Listen carefully** without judgement or interruption.
- **Avoid investigating** or asking leading questions; if clarification is needed, use open-ended questions.
- **Record** the learner's exact words, sign and date the record.
- **Report immediately** to the DSL or Deputy DSL and pass on the written record.
- **Maintain confidentiality**, sharing only with those who need to know.
- **Do not promise confidentiality**; explain that information may need to be shared for their safety.

If a learner is in **immediate danger**, contact the emergency services and ensure they are supervised and safe until authorities arrive.

All concerns must be emailed securely to the DSL or Deputy DSL.

10. Child Sexual Exploitation (CSE)

Definition:

CSE is a form of child sexual abuse in which a child or young person is manipulated, coerced, or deceived into sexual activity in exchange for goods, affection, money, status, or substances.

Children may believe they are in a consensual relationship (grooming) and may not recognise the abuse. CSE may involve trafficking within or into the UK, organised exploitation, or gang activity.

Key indicators include:

- Unexplained gifts or money
- Absences from education or training
- Relationships with significantly older individuals
- Sudden changes in appearance or behaviour

Action:

Staff who suspect CSE must follow Poplar HARCA/CAN Trust safeguarding procedures and inform the DSL immediately.

Further guidance:
<https://www.nspcc.org.uk/keeping-children-safe/types-of-abuse/child-sexual-exploitation/>

11. Honour-Based Abuse, Female Genital Mutilation (FGM), and Forced Marriage

Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the *Female Genital Mutilation Act 2003* (as amended by the *Serious Crime Act 2015*) and constitutes a form of child abuse and violence against women and girls.

Mandatory	Reporting	Duty:
Regulated health and social care professionals and teachers must report to the police (by calling 101) if, in the course of their duties, they:		


- Are informed by a girl under 18 that FGM has been carried out on her, or
- Observe physical signs that FGM has been carried out on a girl under 18 (unless medically necessary).

The duty is personal and cannot be delegated. Reports should be made as soon as possible, ideally by the close of the next working day.

Staff must also inform the DSL immediately so that Poplar HARCA/CAN Trust records and safeguarding actions can be completed.

Maintain comprehensive records, including:

- Details of the disclosure or identification
- Actions taken and when
- Police case reference number (if applicable)

Further advice:
 [FGM help and advice – GOV.UK](#)

Forced Marriage

Forced marriage is a crime and a form of abuse involving coercion, threats, or violence to make someone marry against their will. It can affect both adults and children.

It differs from an arranged marriage, where both parties consent to the union.

Action:

Any staff member who suspects a learner is at risk of, or has been subjected to, a forced marriage must inform the DSL immediately. The DSL will contact the Forced Marriage Unit (FMU) and/or the police as required.

Further

guidance:

 [Forced marriage – GOV.UK](#)

12. Grooming

Definition:

Grooming refers to when someone builds a relationship, trust, or emotional connection with a child or vulnerable adult to exploit, manipulate, or abuse them.

Grooming may occur:

- **Sexually**, both online and in person.
- **For criminal or extremist purposes**, including radicalisation or gang recruitment.

Sexual Online Grooming

Occurs when individuals use the internet or social media to befriend, manipulate, or exploit children or vulnerable adults.

Indicators include:

- Increased secrecy about online activity or contacts.
- Sudden changes in behaviour, mood, or appearance.
- Possession of unexplained devices, gifts, or money.
- Use of sexualised language unexpected for their age.

Staff responsibilities:

- Be alert to online grooming risks and report any concerns immediately to the **DSL or Deputy DSL**.
- Follow Poplar HARCA/CAN Trust reporting and recording procedures, do not attempt to investigate.

13. Contextual Safeguarding

All staff must recognise that safeguarding incidents may occur **beyond the organisation** (e.g., in communities, online, or peer groups).

These external factors can increase vulnerability to:

- Sexual or criminal exploitation
- Serious youth violence
- Online harm

The **DSL** and **Deputy DSL** must consider contextual risks when assessing concerns and liaise with local safeguarding partners for coordinated support.

14. Child-on-Child Abuse (formerly Peer-on-Peer Abuse)

Includes, but is not limited to:

- physical or sexual abuse
- Sexual harassment and online sexual abuse
- Emotional or psychological harm
- Bullying (on or offline)
- Teenage relationship abuse
- Grooming for criminal or sexual exploitation

Key

principle:

Child-on-child abuse is never acceptable and will not be dismissed as “children being children.”

All staff must:

Recognise the signs of abuse between children or young people.

Follow Poplar HARCA/CAN Trust safeguarding and behaviour policies to ensure safety and support.

Refer to the DfE guidance: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021), updated under KCSIE 2025.

15. County Lines and Criminal Exploitation

County lines refers to illegal drug networks that exploit children and vulnerable adults to transport and sell drugs across areas.

Victims are often manipulated, threatened, or trapped by “debt bondage.”

Staff should be aware of:

- Unexplained money, gifts, or new possessions.
- Increased absences or associations with older groups.
- Signs of coercion, fear, or unexplained injuries.

Further guidance:

[Criminal Exploitation of Children and Vulnerable Adults: County Lines \(Home Office\)](#)

[National Crime Agency – County Lines](#)

16. Keeping Yourself Safe

Staff must maintain clear professional boundaries and protect both themselves and learners.

Strictly prohibited:

- Adding or befriending learners on personal social media.
- Sharing personal telephone numbers or contact details.
- Visiting learners at home.
- Using sarcasm, insults, or belittling language.
- Engaging in personal or romantic relationships with learners.

Maintain confidentiality where appropriate but never promise secrecy. Always explain that disclosures must be shared with the DSL to keep people safe.

17. Mental Health and Wellbeing

Educational providers play a crucial role in supporting learner mental health.

Staff should recognise that mental health concerns may indicate or result from abuse, neglect, or exploitation.

Only trained professionals can diagnose mental health conditions, but all staff are well-placed to observe warning signs.

Support resources:

- MindEd e-learning
- [Every Mind Matters](#)
- Education Support
- Jisc Digital Wellbeing Guide
- [Samaritans – Guidance for Education Settings](#)

Staff are encouraged to:

- Conduct regular welfare checks.
- Promote self-care and resilience.
- Integrate mental health topics into PSHE and wellbeing activities.

18. Cyberbullying

Cyberbullying uses electronic communication to harass, intimidate, or abuse individuals.

Common

Social media, messaging apps, gaming platforms, and forums.

platforms:

At-risk groups:

- Children and young people online without supervision.
- Vulnerable adults who may have reduced digital literacy or social confidence.

Staff must monitor for indicators, report promptly, and support victims sensitively.

19. Upskirting and Sexting

Upskirting: taking a photograph under someone’s clothing without their knowledge or consent for sexual gratification or humiliation — is a criminal offence under the *Voyeurism (Offences) Act 2019*.

Sexting (Sharing nudes or semi-nudes): It is illegal to create, possess, or share sexual images of anyone under 18, even if created consensually.

Further

[NSPCC – Sexting Advice for Professionals](#)

guidance:

20. Serious Violent Crime, Gangs, and Knife Crime

All staff must be aware of risk indicators such as:

- Sudden absences or decline in performance.
- New friendships with older individuals or gang members.
- Signs of fear, injuries, or possession of weapons.
- Unexplained gifts or money.

Key guidance:

Preventing Youth Violence and Gang Involvement (Home Office)

[Criminal Exploitation of Children and Vulnerable Adults \(Home Office\)](#)

21. Multi-Agency Working

In line with *Working Together to Safeguard Children 2023*, Poplar HARCA/CAN Trust collaborates with three statutory safeguarding partners:

- Local Authority (LA)
- Integrated Care Board (ICB) (replacing Clinical Commissioning Group)
- Local Police Force

Poplar HARCA/CAN Trust senior leadership, DSL, and Board are responsible for engaging with local arrangements and sharing safeguarding intelligence effectively.

22. Risk Assessment and SEND Learners

Risk assessments are central to safeguarding planning and include:

- Company-wide risk register (includes safeguarding section)
- Staff safeguarding risk assessments
- Activity-specific and individual learner risk assessments

Reviewed at least annually or following significant incidents.

Learners with SEND

Learners with SEND are at greater risk of abuse due to communication challenges and reliance on adults.

Protective measures:

- Targeted staff training on recognising abuse in SEND learners.
- Accessible communication tools (e.g., PODD books, symbols, visual supports).
- Anti-bullying and inclusion strategies.
- Regular emotional wellbeing checks and confidential communication channels.
- Named safeguarding lead with SEND awareness.

23. Raising Awareness of Safeguarding Procedures

Safeguarding is everyone's responsibility.

Learners

Induction must include:

- What safeguarding means.
- How to report concerns (for themselves or others).

- The names and contact details of the DSL and deputies.

Staff

Staff induction includes:

- Safeguarding reporting procedures.
- Responsibilities under Poplar HARCA/CAN Trust Safeguarding Policy.
- Completion of Child and Adult Safeguarding Awareness Training within the first month of employment.

Employers (Work Placements / Traineeships)

- Receive safeguarding briefing from Poplar HARCA/CAN Trust prior to learner placements.
- Nominate a trained key contact for safeguarding matters.
- Sign a Safeguarding Declaration confirming understanding of responsibilities and procedures.

24. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

Note 1: Promises of confidentiality must not be given as the matter may develop in such a way that these promises cannot be honoured.

Note 2: Learning Difficulties and/or Disabilities – Some people with learning difficulties and/or disabilities may need different treatment to other persons e.g. in the way their physical or mental condition might mask possible abuse.

Note 3: Forced Marriage – If there are concerns that a vulnerable person (male or female) is in danger of a forced marriage, you should contact the company nominee for safeguarding who will contact the Forced Marriage Unit (FMU) on 020 7008 0151 or by visiting the FCDO Forced Marriage Unit webpage. The police and Children’s Social Care (CSC) will also be contacted. You can also call 101 for advice and guidance.

If the complainant is the person being abused, 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 court proceedings.

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 others present

- the name of the complainant and, where different, the name of the young person who has allegedly been abused
- the nature of the alleged abuse
- a description of any injuries observed
- an account of the allegation that should be signed and dated by the person completing the report

Any suspicion, allegation or incident of abuse must be reported to the DSL (or deputy DSL in their absence) as soon as possible and within two hours.

The DSL shall telephone and report all allegations and incidents of abuse to either the Children's Social Care duty social worker or the Adult Safeguarding Team before the end of the company day. A written record of the date and time of the report shall be made and must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant department within 24 hours.

The DSL should discuss with Children's Social Care what action will be taken to inform the parents/carers of the individual, and a note of that conversation should be made.

If the DSL cannot be contacted within 2 hours of the allegation or observation, the person making the report must notify Children's Social Care directly and inform the company's nominated member of staff as soon as possible about the action taken.

The nominated member of staff must notify the Directors of any allegation or incident as soon as practicable and in any event within 24 hours of the initial concern arising.

Written records

The DSL shall retain a copy of:

- the report
- any notes, memoranda or other correspondence dealing with the matter
- any other relevant material

Copies of reports, notes etc. must be kept securely locked at all times and processed in line with the **Data Protection Act 2018 and UK GDPR**.

For further information: Report child abuse to local council

25. Reporting and Dealing with Allegations of Abuse Against Members of Staff

Where an allegation of abuse is made, and it involves a member of company staff, the company will comply at all times with the Department for Education guidance Keeping Children Safe in Education (KCSiE 2025), Part 4 – *Allegations of abuse made against staff and low-level concerns*.

This part of the policy relates to members of staff and volunteers. Allegations against a staff member who is no longer employed by Poplar HARCA/CAN Trust should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees and must ensure effective support for anyone facing an allegation. It is essential that any allegation of abuse made against a member of staff or volunteer is dealt with quickly, fairly and consistently to protect the complainant and support the individual subject to the allegation.

Allegations against staff should be reported to the Director, who will consult with the DSL. The Director may delegate the task to the Assistant Director(s) who will inform the accused person.

The DSL or Director must contact the Local Authority Designated Officer (LADO) within one working day of any allegation against a member of staff or volunteer.

Employers must consider carefully whether the circumstances of a case warrant suspension or whether alternative arrangements can be put in place until the allegation is resolved.

Full records must be made about the alleged incident(s) as described above.

Individuals should be informed of concerns as soon as possible and given an explanation of the likely course of action (unless advised otherwise by Children's Social Care or the police). They should be encouraged to seek union support and be given access to welfare or medical advice as appropriate.

Particular care should be taken to ensure that employees under suspension are kept informed of progress and not isolated from support networks unless these risks prejudicing evidence.

Parents or carers of the child or vulnerable adult involved should be informed as soon as possible (subject to discussion with relevant authorities) and kept updated throughout the process. The Company will co-operate fully with the Police, Social Care and other agencies as required.

If the Designated Safeguarding Lead is the subject of the allegation or complaint, the matter must be reported directly to the Director.

26. Confidentiality

All staff and stakeholders must maintain strict confidentiality in relation to any safeguarding allegation or concern.

It is extremely important that, when an allegation is made, the organisation makes every effort to maintain confidentiality and guard against unwanted publicity while an investigation is ongoing.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against staff whilst investigations are ongoing, as set out in Section 141F of the Education Act 2002. If parents wish to apply to the court to have reporting restrictions removed, they should seek legal advice.

All records must be processed and stored in accordance with the UK GDPR and Data Protection Act 2018. Information sharing for safeguarding purposes is always lawful where there is a risk of harm.

27. Internet Safety, IT, Cyber Security and Virtual Lessons

The internet is used within Poplar HARCA/CAN Trust to raise educational standards, support staff professional practice and enhance management functions. Technology is a core part of modern life, education and business, and we aim to equip learners with the skills to use it safely and confidently.

Safeguarding learners and tutors online

Online learning and remote delivery must follow the same principles as set out in the organisation's **Staff Code of Conduct** and **Safeguarding Policy**. Staff should ensure that the environment, tone and materials used in virtual sessions meet the same standards as face-to-face learning.

Relevant guidance:

- Teaching online safety in schools (DfE 2024)
- Education for a Connected World (UKCIS Framework 2024)
- National Cyber Security Centre – Education Resources
- UK Safer Internet Centre – Safe Remote Learning
- Action Fraud – Cybercrime and Fraud Reporting

Potential Online Risks

Staff and volunteers must remain alert to risks and take steps to mitigate them:

- **Content** – exposure to age-inappropriate or illegal material
- **Contact** – grooming or manipulation via digital communication
- **Conduct** – harmful behaviour such as harassment, extremism, or self-harm content
- **Commerce** – financial scams, identity theft, phishing
- **Culture** – cyberbullying, hate speech, misinformation

Phishing is the fraudulent practice of sending emails purporting to be from reputable companies to obtain personal data such as passwords and bank details. See [APWG](#) for guidance.

Virtual Lessons and Live Streaming

When delivering online lessons, staff should:

- Use approved platforms with security settings enabled
- Consider background visibility when on camera
- Maintain professional language and boundaries
- Ensure learners and parents understand the code of conduct for virtual learning

Further guidance:

- NCSC – Video Conferencing Security
- UK Safer Internet Centre – Remote Teaching Advice

Cyber Security

Cyber security protects devices (smartphones, computers, tablets) and the data they hold from theft or damage. Organisations must keep systems updated, use anti-virus software, strong passwords, and two-factor authentication.

Regular software updates and restricted permissions are essential to reduce risk. The company is required to maintain a current Cyber Essentials or Cyber Essentials Plus certificate to access funding and demonstrate good practice.

Further information: ESFA Cyber Essentials Scheme

28. Children who are lesbian, gay, bisexual, or gender questioning

Page 56 of the updated 2025 guidance identifies specific risks faced by LGBT children and young people.

- Staff should be aware of these risks and know how to mitigate them.

- Further reading and resources are available for staff to better understand safeguarding for LGBT learners.

29. Safer Recruitment and Selection

- The Company adheres strictly to safer recruitment processes and best practice: [NSPCC Safer Recruitment](#)
- This includes scrutinising applicants, verifying identity, checking academic/vocational qualifications, obtaining references, and confirming previous employment history.
- All candidates must demonstrate health and physical capacity for the role. Interviews, reference checks, and Disclosure and Barring Service (DBS) checks are mandatory.

Statutory Requirements:

- Enhanced DBS disclosure for all appointments working with vulnerable adults or children.
- Maintain a Single Central Record (SCR) of all staff checks.
- Additional checks for staff who have lived outside the UK.
- Ensure supply/temporary staff have undergone necessary checks.
- Identity checks must be carried out before appointment.

Single Central Record:

The Company maintains an SCR covering all staff, governors, volunteers, and others who may have routine contact with vulnerable learners.

30. Monitoring and Review

The safeguarding policy will be reviewed at least annually, or sooner if changes in law, guidance, or best practice require.

31. Whistleblowing and Complaints

- Staff must report concerns if another member of staff is acting in a way that may be unsuitable, causing harm, or committing a criminal offence.
- Allegations must be reported immediately to the Director, who will inform the DSL and Assistant Director(s).

Allegations may include:

- Concerns about suitability to work with children or vulnerable adults.

- Concerns where harm to a learner may have occurred.
- Safeguarding concerns that are criminal in nature or intent.

Alternative Reporting Channels:

Staff unable to raise concerns internally can contact the NSPCC dedicated helpline:

Poplar HARCA/CAN Trust **staff can call:** 0800 028 0285 (8:00 AM – 8:00 PM, Mon–Fri)

Email: help@nspcc.org.uk

Sharing Low-Level Concerns (KCSiE 2025):

Schools and colleges must have a clear, confidential procedure for sharing low-level concerns.

Initial sharing may be with the DSL or a nominated person; the head of service is the ultimate decision-maker.

DSL and leadership should make timely decisions about the handling of each low-level concern.

Reference: KCSiE 2025, pages 109–110.

32. Related Policies

The following policies incorporate the Company’s approach to safeguarding:

- Prevent
- Whistleblowing
- Bullying and Harassment
- Comments and Complaints
- Health and Safety Policy

33. Safeguarding-Related Contacts

GLA Contact Information:

For under 18s (and those up to 24 with an EHCP – Education and Health Care Plan):
[Children’s Safeguarding Contacts London – London Safeguarding Children Board](#)

For over 18s without an EHCP, identified as vulnerable – Social Care:
[City of London Adult Social Care Team](#)

In emergencies: Call **999**

34. Further Reading and Information

Child-on-Child Sexual Violence and Sexual Harassment:

Guidance from *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* has been incorporated into KCSiE.

- **Paragraph 473:** Highlights that child-on-child abuse laws are designed to protect children, not criminalise them.
- **Paragraph 487:** Emphasises understanding intra-familial harms and providing support to siblings following incidents.
- **Paragraph 497:** Stresses that schools and colleges should engage with statutory safeguarding partners during relevant discussions.
- **Paragraph 538:** Notes that children who have experienced sexual violence can display a wide range of responses.
- **Page 163:** Covers guidance on **Forced Marriage**.

Additional Resources:

UK Council for Internet Safety (UKCIS) Guidance:

[Education for a Connected World](#)

[Sharing Nudes and Semi-Nudes Advice](#)

[Using External Visitors to Support Online Safety Education](#)

National Crime Agency – CEOP Education Programme: [Thinkuknow](#)

Public Health England – Every Mind Matters:
<https://campaignresources.dhsc.gov.uk/campaigns/better-health-every-mind-matters/>

Harmful Online Challenges and Hoaxes:
Guidance includes preparation, parent/carers communication, and sources of support: [Gov.uk Guidance](#)