

Safeguarding Policy



Potential powered up

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DOCUMENT CONTROL

Version	Name	Comment	Date
1.0	Alison Dann	First edition (Review of current safeguarding policy and procedure conducted and incorporated both documents into one full procedure) Includes KCSIE 2025	15/09/2025
2.0	Alison Dann	Updated for KCSIE 2026. Changes are limited to provisions relevant to an Independent Training Provider; school-only provisions are excluded.	01/09/2026

Policy Statement

For the purpose of clarity, the term “Leep” refers to the family of Leep organisations – Back to Work, Leep Trade, Leep Talent and Equality Training.

Applicability of KCSIE 2026: for the purposes of the guidance, 'college' includes providers of post-16 education such as Independent Training Providers. LEEP applies the relevant requirements to children receiving education or training. Provisions expressly limited to schools, such as school premises, boarding, PE/sport and school mobile-phone rules, are not incorporated unless they become relevant to a specific delivery arrangement or contract.

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1.0 Statement

Leep Group recognises our moral and statutory responsibility to safeguard and protect young people and adults at risk of harm in our care whether from crime, other forms of abuse or from being drawn into terrorism related activity. It applies to all aspects of our work and to everyone working for Leep, including governors, employees, contractors, freelance staff etc. It is essential that everybody working at Leep understands their safeguarding responsibilities. Hereinafter referred to as colleagues. Governors and trustees will receive safeguarding and Prevent training at induction and at regular intervals thereafter. Safeguarding will be a standing item at board meetings to ensure robust oversight.

2.0 Policy Aims

- Provide a safe learning environment where learners/ apprentices and apprentices feel confident to raise concerns.
- Ensure staff understand their safeguarding responsibilities and are trained at induction and refreshed annually.
- Act swiftly and proportionately to safeguard learners/ apprentices at risk of abuse, neglect, exploitation, or radicalisation.
- Monitor learners/ apprentices and apprentices at risk and contribute to multi-agency assessments and plans.
- Ensure safe recruitment and maintain a Single Central Record.
- Build effective working relationships with statutory partners (local authority, social care, police, health).
- Ensure safeguarding remains a governance priority with regular oversight.

3.0 Legal Framework and Guidance

This policy is underpinned by the following legislation and statutory guidance:

- Children Act 1989 and 2004
- Education Act 2002 (s.175 duty to safeguard in education and training)
- Education and Skills Act 2008
- Education and Training (Welfare of Children) Act 2021
- Education (Pupil Registration) Regulations 2006 (as amended) – attendance monitoring linked to safeguarding
- Equality Act 2010
- Domestic Abuse Act 2021
- Mental Capacity Act 2005
- Care Act 2014
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Safeguarding Vulnerable Groups Act 2006

- Voyeurism (Offences) Act 2019
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Human Rights Act 1998
- Working Together to Safeguard Children (2026)
- Keeping Children Safe in Education (KCSIE) 2026 (effective 1 September 2026)
- Working Together to Improve School Attendance (statutory from 2024) – applied proportionately to FE learners/ apprentices aged 16–18
- SEND Code of Practice 2015
- Safer Working Practice Guidance (2019 update)
- Local safeguarding partnership procedures (Manchester, London, Middlesbrough) are followed where relevant

4.0 Legal Definitions -For the purpose of this policy:

4.1 Safeguarding

- For children, safeguarding means providing help and support as soon as problems emerge; protecting them from maltreatment inside or outside the home, including online; preventing impairment of mental or physical health or development; supporting safe and effective care; and taking action to secure the best outcomes. For adults at risk, Leep follows the Care Act 2014 definition and procedures.

4.2 Children or young person

- Applies to a person who is less than 18 years of age. For Leep this relates to our Apprenticeship, Study programme and T Level learners/ apprentices that are aged between 16-18.

4.3 Adults at risk

- In line with the Care Act 2014, safeguarding adults includes risks of: financial exploitation, modern slavery and trafficking, domestic abuse, neglect or self-neglect, discriminatory abuse alongside other vulnerabilities including radicalisation. For Leep this relates to any learner who meets the criteria above on either our Apprenticeship programmes, Bootcamps and/or Adult provision (ASF).

4.4 Radicalisation

- Is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and dedication to an ideological cause.

4.5 Identifying Radicalisation

All staff must remain vigilant to the risk of radicalisation. It can be subtle and difficult to recognise, but warning signs that a learner or colleague may be at risk include:

- Failure to uphold or actively rejecting British Values: democracy, rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs (and those with none).
- Social isolation from family, friends, or peer learning groups.
- Speaking in a way that appears scripted or rehearsed.
- Showing unwillingness or inability to openly discuss their views.
- Developing a sudden disrespectful or hostile attitude towards others.
- Displaying increased levels of anger or agitation.
- Becoming increasingly secretive, especially regarding internet use or online activity.

Staff should record and report concerns immediately to the DSL or safeguarding team, even if only one or two indicators are present.

5.0 Safeguarding Culture

Leep group believe in a culture of Safeguarding and promoting the welfare of individuals as safeguarding is at the heart of everything, we do.

We are committed to:

- Creating a culture of vigilance where all staff and learners/ apprentices understand safeguarding is everyone's responsibility.
- Promoting a safe, respectful environment where concerns, including those about sexual harassment, abuse or violence, are taken seriously and acted upon.
- Embedding safeguarding within the curriculum and daily practice, helping learners and apprentices to recognise risks and build resilience.
- Ensuring staff receive regular training, so they are confident in identifying, reporting, and managing concerns.
- Working in partnership with external agencies to provide effective support and intervention.

6.0 Prevention/Protection

- We create a culture where sexual harassment, abuse, online exploitation, bullying and unsafe practices are not tolerated. Victims will be listened to, taken seriously, and supported. Learners/ apprentices and staff are encouraged to share concerns through multiple reporting channels.

7.0 Multi-Agency Working

- Leep works with local safeguarding partners (Manchester, London and West Midlands) and statutory agencies. For children, this includes universal services and community-based early help, targeted early help and if required through Family Help, and Prevent or Channel referrals where required. Staff will support children's social care and other agencies following a referral.

8.0 Attendance and Safeguarding

- For learners/ apprentices aged **16–18**, persistent or unexplained absence will be treated as a safeguarding concern and escalated to the DSL and, if necessary and related, Children's Social Care.
- For **adults (19+)**, absence will be escalated if linked to risk of harm, neglect, exploitation or radicalisation.
- Attendance monitoring is part of early intervention, in line with *Working Together to Improve School Attendance*.

9.0 Online Safety

We recognise online risks under the **Four Cs**:

- Content** (harmful material, misinformation, disinformation, conspiracy theories)
- Contact** (grooming, exploitation)
- Conduct** (cyberbullying; making or sharing nudes or semi-nudes including through the use of AI; abusive, misogynistic or misandrist content; harmful online behaviour)
- Commerce** (scams, gambling, financial exploitation)

Emerging risks include sextortion, grooming through AI-enabled services, radicalisation online, and images that are digitally altered or wholly generated using artificial intelligence, including deepfakes and deep nudes. Any use of generative AI must consider safeguarding, ethics, data protection and intellectual-property risks.

Leep systems and devices used for learning are subject to appropriate filtering and monitoring. Staff training includes online harms, AI awareness, safe reporting, and the relevant roles and escalation routes for filtering and monitoring concerns.

The effectiveness of filtering and monitoring will be reviewed at least once each academic year by the

responsible senior leader, supported by the DSL and IT. Checks will cover internet-connected devices in relevant Leep learning locations, be recorded, and be informed by an annual online-safety risk assessment reflecting the risks faced by learners/ apprentices.

10.0 Subcontractors

- When learners/ apprentices/ apprentices are placed with subcontractors or external providers, written confirmation of safeguarding arrangements must be obtained.
- Leep retains overall safeguarding responsibility.

11.0 Roles and Responsibilities

- All staff - must identify concerns, report immediately, and read KCSIE in full.
- Designated Safeguarding Lead (DSL) - senior leader with overall responsibility across Leep Group.
- Robust cover arrangements must operate whenever the DSL is unavailable. The relevant safeguarding inbox must be monitored by authorised DSL/DSO staff, so concerns are received and acted on without delay.
- Designated safeguarding officers- Available across the providers to respond to referrals.
- Governors- Must receive safeguarding and Prevent training at induction and refreshers. Safeguarding is a standing agenda item at board meetings.

12.0 Training

- All staff receive safeguarding induction and annual refreshers.
- Training covers, online harms, Prevent, modern slavery, criminal and sexual exploitation, harmful sexual behaviour, making or sharing nudes or semi-nudes (including AI-generated or altered images), and other emerging risks.
- Governors and trustees receive induction and refresher training.

13.0 Information Sharing & GDPR

- Information will be shared lawfully under the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 where necessary to protect learners/ apprentices. Data protection law does not prevent proportionate information sharing for safeguarding purposes, including without consent where there is a lawful basis and seeking consent would cause delay or increase risk.

- Information shared must be relevant to the current risk, necessary for the recipient, clearly presented and appropriately contextualised. Decisions to share or withhold information, including the rationale, must be recorded. Fear about information sharing must not obstruct action needed to safeguard a child or adult at risk.
- Staff cannot promise confidentiality.
- Multiple emergency contacts will be held for each learner.

14.0 Safer Recruitment

We ensure robust recruitment in line with statutory requirements:

- Enhanced DBS checks
- Barred list checks for regulated activity
- Verification of identity, qualifications, employment history
- Ongoing vigilance for staff conduct concerns

15.0 Code of Conduct for Staff

Colleagues are expected to take the following steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Avoiding any unnecessary physical contact with learners/ apprentices.
- Avoiding unaccompanied journeys with learners/ apprentices.
- Avoiding inappropriate familiarity with learners/ apprentices.
- Always acting upon and recording allegations or reports made by learners/ apprentices.
- Always reporting potential concerns.
- Not inviting learners/ apprentices to socialise with them or visit them at home.
- Not engaging with learners/ apprentices on social media.
- Recognising that it is a criminal offence to engage in sexual activity with a person under the age of 18 when in a position of power/trust.

In appropriate cases and in accordance with the law, Leep has the right to report to the appropriate authorities any concerns it has that a colleague or learner ought to be included in a list of people who should be restricted from working with children and vulnerable adults.

16.0 Allegations Against Staff

- Allegations against staff will be reported to the DSL and LADO.

- Low-level concerns (concerns which do not reach the harm threshold) are recorded and managed under safer working practice guidance.
- Leep will refer to the Disclosure and Barring Service where it removes an individual from regulated activity, or would have removed them had they not left, and the statutory referral criteria are met.
- The referral duty applies to paid staff and to volunteers who were engaged in regulated activity and may arise following suspension, redeployment, dismissal, resignation or cessation of volunteering.
- A person leaving does not end the investigation or remove the duty to refer. Referrals will be made as soon as possible with sufficient relevant information.

17.0 Allegations against the DSL

- If a member of staff has an allegation against the DSL with regards to a safeguarding concern, the external safeguarding governor will investigate this fully, following the processes outlined above. The governor with responsibility for safeguarding is Bob Busby and can be contacted confidentially via email at bobbusby@hotmail.co.uk

18.0 How to Respond and Report

If you become aware of a safeguarding concern or allegation, you must follow these steps without delay:

Initial Response

- Stay calm and reassure the person they have done the right thing in speaking up.
- Listen carefully and allow them time to share their concern.
- Do not express personal opinions, judge, or dismiss the concern.
- Do not promise confidentiality — explain that information will be shared only with professionals who need to know in order to protect them.

19.0 Immediate Actions

- Act promptly — do not attempt to investigate or resolve the matter yourself.
- Report the concern immediately:
 - Alert a Safeguarding Officer directly (in person or by phone).
 - Formally submit the concern via safeguarding@leepgroup.com
- Complete a Cause for Concern (CFC) form, providing clear factual information.

- Record a statement with as much detail as possible (dates, times, names, what was said, and how you responded). As far as possible record in the persons own words – do not paraphrase or substitute words or meanings
- Do not make assumptions or discuss the concern with anyone not directly involved.

20.0 Role of the Designated Safeguarding Lead (DSL)

- The DSL will ensure the correct safeguarding procedures are followed and that a trained DSO or equivalent cover arrangement is available whenever the DSL is unavailable.
- HR will be informed where allegations involve staff.
- The DSL will inform the Local Authority Designated Officer (LADO) to determine next steps.
- In cases of suspected radicalisation, the DSL will consult the Contest Coordinator and, where appropriate, make a Prevent referral to the police. Any new or further information arising while the referral is being assessed will also be passed to the police.
- If the matter is referred to external agencies (e.g. Police), the DSL will act as main liaison officer and ensure updates are provided to the Managing Director and HR.

21.0 The safeguarding Team Across The Group

DSL LEEP Group	Alison Dann Group Director Quality & People Telephone Number 0161 474 7603
DSO	Ben Waite Group Associate Director People Telephone Number: 0161 567 9643
DSO	Gayle Dawkes Group People Manager Telephone Number 0161 567 9536
DSO	Andrew Simms DSO/ Health and Safety Telephone Number 0161 567 9594

DSO	Natasha England Grp Associate Director Quality Telephone number 0161 474 7603
DSO	
24-hour safeguarding emails safeguarding@Leepgroup.com	

22.0 How to make a referral to the Safeguarding Team?

- Use the dedicated email service which will automatically be sent to the Safeguarding Team outlining in the message the key points that a safeguarding concern has been raised and completion of safeguarding referral form.
- Subcontractors- Refer to subcontractors' procedure for reporting concerns. LEEP will obtain written confirmation of safeguarding arrangements from all subcontractors.

23.0 Safeguarding Referral Process

Use Appendix 1: Safeguarding Referral Form when making a report to the Safeguarding Team. Completing the form in full provides the team with the detailed information they need to respond quickly and appropriately.

The flowchart below outlines how the referral process works

Safeguarding concerns: what staff must do



Recognise • Respond • Record • Report — without delay



24.0 Escalation of Cause for Concerns logged

In the event that a cause for concern is logged which indicates that an individual is at risk of serious harm or may be at serious risk of harming themselves or others, this will be immediately reported to the Group CEO and the Board. In the event this occurs, the following actions will take place:

- DSL to inform the Group CEO and Governing Safeguarding Lead.
- Designated Safeguarding Lead to facilitate a conference call to discuss the matter in full and steps to be taken (if required) to be agreed.
- Accountable Designated Safeguarding Officer to document all actions and co-ordinate.
- Accountable Designated Safeguarding Officer/ Lead to update Group CEO on actions appropriately until matter is closed.

25.0 Learners/ apprentices who are particularly Vulnerable

To ensure that all of our learners/ apprentices receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked after children and previously looked after children.
- On Child Protection Plans (For Leep, learners/ apprentices 16-18)
- Asylum seekers
- Young Carers
- Learners/ apprentices who are pregnant and/or parents themselves.

- Learners/ apprentices with SEND, disabilities, relevant medical conditions or communication barriers.
- Learners/ apprentices experiencing mental-health concerns, self-harm, suicidal ideation or risk of suicide.
- Learners/ apprentices with disrupted education, repeated or prolonged absence, or a history of offending or exploitation.
- Living away from home/private fostering
- Children in the court systems/YOT/ pending police investigations.

If colleagues become aware of learners/ apprentices within this specific group, this information should be referred to the safeguarding team. Safeguarding Procedures **must be followed** whenever an allegation of abuse is made, or concern is expressed regarding the behaviour towards a child adult at risk or a colleague.

It is important to note that under the Sexual Offences Act 2003 it is a criminal offence for a person over the age of 18 in a position of trust to enter into a sexual relationship with any learner under 18 years of age, even if the relationship is consensual, or in the case of a learner over 18 years where the learner is vulnerable.

26.0 Low-Level Concerns and Staff Conduct

- Staff must report low-level concerns about adults that do not meet the threshold for an allegation but may indicate a risk pattern.

27.0 Record Keeping and Information Sharing

- All safeguarding concerns, discussions, decisions, actions and outcomes must be recorded clearly, accurately, securely and chronologically, including the rationale for decisions and whether a referral was or was not made.
- Records will be accessible only to those who need them and transferred promptly and securely when a learner moves to another education or training setting so that relevant risks and support needs are understood.
- Information is shared on a need-to-know basis and must be relevant, proportionate, necessary and appropriately contextualised, in line with statutory guidance and data protection law.

28.0 Pre-course Disclosures

- Any disclosures by potential learners/ apprentices relating to probation, spent or unspent convictions should be reported to the safeguarding team using the safeguarding referral form found in the safeguarding section of SharePoint.

- All colleagues must be alert to, and aware of the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and colleagues need to take notice not only of major incidents but also other signs which may cause concerns.

29.0 LEEP Relevant Policies and Procedures

- Safeguarding Appendices
- Prevent Strategy
- Prevent Risk Assessment
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Whistleblowing Policy
- Grievance Policy
- Staff behaviour Policy
- Safer Recruitment Policy
- Learner Disciplinary Suspension Procedure
- Staff Disciplinary Policy
- Subcontractors Procedure for reporting safeguarding concerns.

URGENT

If anyone is in immediate danger, call 999 and notify the Safeguarding Team without delay. Do not investigate or promise confidentiality.

1. Person the concern is about

Full name		Date of birth / age	
Course Programme Title		Start/ End date	
Tutor Name		Programme / location	Online/ Classroom

2. Person making the concern

Name / role		Contact details / date completed	
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3. The concern

Date / time of concern		Location	
Became aware by		Immediate danger?	☐ Yes ☐ No

What happened?
Give a clear factual account, including the person's exact words and key dates, times, people and locations.

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Action already taken to keep the person safe	Person's wishes / support needs

4. SAFEGUARDING TEAM ONLY

Received date / time		Received by	
Current risk	☐ Immediate ☐ None	☐ Ongoing ☐ Unclear	
Transferred to Risk register	☐ Yes ☐ No	Signature / date	