SAFEGUARDING AND CHILD PROTECTION POLICY 2026/27

Central Training Academy

Policy owner	Designated Safeguarding Lead	**Approved by**	Board of Directors
Effective	1 September 2026	**Review due**	31 August 2027
Lead DSL	Sarah Ludlow	**Deputy DSLs**	Centre-specific named deputies
Version	2.0	**Approval date**	30 August 2026

1. Purpose and safeguarding commitment

Central Training Academy (CTA) is committed to safeguarding and promoting the welfare of children and adults at risk. Safeguarding is everyone's responsibility. CTA will take a child-centred and person-led approach, act in the learner's best interests, provide help as soon as concerns emerge, protect learners from harm within or outside the home and online, and work with statutory partners to secure effective support and protection.

This policy establishes the arrangements that staff, directors, volunteers, contractors, employers, subcontractors and visitors must follow. Concerns must never be ignored because they appear minor, occur outside CTA, involve another learner or are reported online.

2. Scope and status

This policy applies to all CTA provision, centres, remote delivery, employer settings, placements, subcontracted delivery and activities. A child is anyone under 18. An adult at risk is an adult with care and support needs who is experiencing, or is at risk of, abuse or neglect and, because of those needs, is unable to protect themselves.

Keeping Children Safe in Education (KCSIE) 2026 is statutory for schools and colleges. CTA will comply wherever it falls within scope and adopts its safeguarding expectations as the minimum operational benchmark for all provision involving children. Adult safeguarding is managed under the Care Act 2014, local Safeguarding Adults Board procedures and the six principles of empowerment, prevention, proportionality, protection, partnership and accountability.

3. Legal, statutory and regulatory framework

- Keeping Children Safe in Education 2026, including Part one, safer recruitment, allegations, child-on-child abuse and the DSL role;
- Working Together to Safeguard Children 2026 and local multi-agency safeguarding arrangements;
- Children Acts 1989 and 2004; Children and Social Work Act 2017;
- Education Act 2002 and Education and Training (Welfare of Children) Act 2021 where applicable;
- Care Act 2014 and Care and Support Statutory Guidance for adult safeguarding;
- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance;
- Domestic Abuse Act 2021; Serious Crime Act 2015; Female Genital Mutilation Act 2003;
- Sexual Offences Act 2003; Modern Slavery Act 2015; Protection from Harassment Act 1997;
- Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012 and DBS requirements;
- Equality Act 2010 and Human Rights Act 1998;
- Data Protection Act 2018, UK GDPR and 2026 statutory information-sharing guidance;
- DfE funding rules and contractual safeguarding requirements for each funded programme;
- Ofsted Further Education and Skills Inspection Toolkit in force from 1 September 2026.

4. Governance and responsibilities

Role	Core responsibility
Board of Directors	Approves policy; appoints a safeguarding link director; receives assurance, themes and serious-risk updates; challenges effectiveness without receiving unnecessary personal data.
Managing Director	Ensures sufficient DSL capacity, resources, safer recruitment, escalation and contractual compliance.
Designated Safeguarding Lead	Holds lead responsibility, manages referrals, provides advice, maintains records, works with partners, transfers files and reports themes to leaders.
Deputy DSLs	Act with DSL authority when delegated and provide accessible cover during delivery hours and activities.
Managers	Embed procedures, release staff for training, respond to low-level concerns and ensure actions are completed.
All staff and volunteers	Read required guidance, attend training, notice indicators, listen, record and report immediately; do not investigate.
Subcontractors and employers	Meet CTA and legal requirements, identify named safeguarding contacts, report concerns promptly and permit assurance activity.

5. Staff knowledge, training and professional curiosity

All staff, including staff who do not work directly with children, must read KCSIE 2026 Part one in full and receive safeguarding and child-protection training at induction. Updates will be provided at least annually and whenever risk or guidance changes. Staff must understand local reporting, early help or Family Help, referrals, whistleblowing, staff conduct, online safety, Prevent, child-on-child abuse and how SEND, communication needs, absence or discrimination can affect risk and disclosure. Understanding will be checked rather than assumed.

6. Recognising harm and additional vulnerability

Abuse, neglect and exploitation may be physical, sexual, emotional, financial, discriminatory, organisational, domestic or online. Staff must remain alert to:

- child sexual exploitation, child criminal exploitation, county lines, serious violence and gang association;
- sexual harassment, sexual violence, harmful sexual behaviour, image-sharing and technology-assisted abuse;
- domestic abuse, coercive control and teenage relationship abuse;
- neglect, homelessness, missing episodes, unexplained absence and changes in engagement or behaviour;
- modern slavery, trafficking, forced marriage, honour-based abuse and female genital mutilation;
- radicalisation, extremist influence, fixation on weaponry or explosives, and hateful or antisemitic narratives;
- self-harm, suicide risk, eating disorders and mental-health concerns where these indicate or increase safeguarding risk;
- abuse of adults at risk, including financial abuse, self-neglect and discriminatory or organisational abuse.

Particular attention will be given to children with SEND or health conditions, care-experienced learners, young carers, learners questioning identity, those facing racism or discrimination, and learners whose needs or communication differences may mask harm. Staff must avoid assumptions and consider multiple, overlapping harms.

7. Responding to a disclosure or concern

- Listen calmly, take the learner seriously and allow the learner to use their own words.
- Do not promise confidentiality, confront an alleged perpetrator, ask leading questions or investigate.
- Explain that information will be shared with people who can help.
- Make a factual, dated record as soon as possible, separating observation, disclosure and professional opinion.
- Report immediately through CTA's safeguarding system or directly to the DSL or deputy.
- If a child or adult is in immediate danger, call 999. Staff may refer directly to children's social care, adult social care or police if necessary and must inform the DSL as soon as possible.

- If the DSL is unavailable, action must not be delayed. Concerns about inaction must be escalated through local authority procedures and CTA whistleblowing arrangements.

The DSL will decide on immediate protection, Family Help or other early support, section 17 or section 47 referral, adult safeguarding referral, police contact, Prevent referral or Channel support, and communication with parents or carers where safe and appropriate. Consent is not required to share information where safeguarding necessitates sharing.

8. Multi-agency working and Family Help

CTA will engage with local multi-agency safeguarding arrangements and respond to lawful information requests. Working Together 2026 replaces a simple divide between early help and child-in-need support with a more integrated Family Help approach, combining targeted early help and section 17 support through coordinated planning where locally implemented. CTA will contribute to assessments, strategy discussions, child-protection conferences, plans and reviews, and will challenge decisions professionally where risk remains.

Practice will be inclusive, anti-racist, anti-discriminatory and culturally informed. CTA will challenge bias, consider disproportionality and recognise hidden harms, including child sexual abuse, domestic abuse and group-based exploitation.

9. Child-on-child abuse

CTA has a zero-tolerance approach to child-on-child abuse and will not dismiss harmful behaviour as banter, part of growing up or an inevitable feature of mixed-age provision. Reports will be risk assessed case by case, with the wishes of the victim considered, immediate safety measures, appropriate separation without creating an unreasonable burden on the victim, referral where thresholds are met, and support for the victim, alleged perpetrator and other affected learners. Criminal processes do not prevent CTA from taking proportionate safeguarding or disciplinary action.

10. Online safety, filtering, monitoring and artificial intelligence

CTA will use a whole-provider approach to online safety covering content, contact, conduct and commerce. Leaders and the DSL will understand the filtering and monitoring arrangements, assign clear responsibilities, review effectiveness at least annually and after significant change or incident, and check that systems do not unreasonably restrict learning or access for learners with additional needs. Staff must report safeguarding concerns arising from social media, messaging, livestreaming, gaming, image-sharing, generative AI, deepfakes or other technology.

Artificial intelligence must not be used to make safeguarding decisions, generate or alter evidence, conduct covert monitoring, or enter identifiable safeguarding information into unapproved systems. AI-generated content may be inaccurate or manipulated and must be treated with professional curiosity, preserved appropriately and escalated to the DSL.

11. Prevent and radicalisation

CTA will maintain a proportionate Prevent risk assessment and action plan, appropriate filtering, staff training, due diligence for speakers and external organisations, and a curriculum that builds resilience and respectful challenge. Staff must report concerns about susceptibility to radicalisation to the DSL. The DSL will assess context, seek advice and make a Prevent referral where appropriate. Consent is not required where sharing is necessary and proportionate to protect the learner or others. Channel is voluntary and multi-agency; emergency threats must be reported to police.

12. Adults at risk

Adult safeguarding decisions will be person-led and proportionate while recognising that public-interest or vital-interest action may be required without consent. The DSL will consider the adult's wishes, mental capacity, coercion, risk to others, crime, organisational abuse and whether the statutory section 42 threshold may be met. Concerns will be referred to the relevant local authority safeguarding adults service and police where required. CTA will not use the label vulnerable adult as a substitute for assessing care and support needs and the specific risk.

13. Allegations, low-level concerns and whistleblowing

Any concern that a person working with children may have harmed a child, committed an offence against a child, posed a risk of harm, or behaved in a way indicating unsuitability must be reported immediately to the Managing Director or nominated case manager, not to the subject of the allegation. The case manager will consult the Local Authority Designated Officer where the harm threshold may be met. If the concern relates to the Managing Director, it must be reported to the Board Chair. Allegations

concerning supply staff, contractors, employers or subcontractors remain CTA safeguarding concerns and must not be passed back without oversight.

Low-level concerns that do not meet the harm threshold must still be recorded, reviewed for patterns and handled under the staff code of conduct. Staff must use whistleblowing routes where safeguarding practice is unsafe or concerns are not acted upon. CTA will make DBS referrals and consider Teaching Regulation Agency or other professional referrals when the legal criteria are met.

14. Safer recruitment and ongoing suitability

- use safeguarding statements in advertisements and scrutinise gaps and inconsistencies;
- verify identity, right to work, qualifications and employment history;
- obtain and verify appropriate references before appointment where practicable;
- complete the correct DBS and barred-list checks only where legally eligible;
- undertake proportionate online searches for shortlisted candidates as part of due diligence;
- apply overseas checks, prohibition, direction or professional-status checks where relevant;
- record required checks in a single central record or equivalent secure compliance register;
- use risk assessment rather than allowing a pending check to be treated as complete;
- provide safeguarding induction and maintain ongoing suitability through supervision, conduct reporting and relevant rechecks.

Adults supervising children on work experience or placements will be assessed against regulated-activity and DBS eligibility rules. CTA will not request checks unlawfully or rely on a host employer's general assurance where a role-specific check or risk assessment is required.

15. Attendance, missing learners and children absent from education

Unexpected or repeated absence, withdrawal, non-engagement and unexplained changes in attendance may indicate abuse, exploitation, neglect, mental ill health or risk of going missing. Staff must follow the missing learner and attendance escalation procedure, attempt safe contact, consider siblings and contextual risks, and refer promptly where safeguarding thresholds are met. Administrative withdrawal must not replace safeguarding action or required notification to a local authority or funding body.

16. Information sharing, records and transfer

Safeguarding records will be factual, contemporaneous, securely stored, access-controlled and separate from general learner records. Records will show the concern, analysis, decision, action, rationale, outcome and review. Data protection law does not prevent necessary and proportionate information sharing to safeguard a child or adult at risk. CTA will share the minimum necessary information, but urgency and safety take priority over consent where there is a lawful safeguarding basis.

When a child transfers, the DSL will ensure the child-protection file is transferred securely, separately from the main learner file and within the period required by KCSIE, with confirmation of receipt. Relevant information may be shared in advance to enable support. Retention and disposal will follow CTA's retention schedule, statutory requirements and local safeguarding guidance.

17. Curriculum, learner voice and accessible support

CTA will provide age-appropriate and accessible learning on healthy relationships, consent, sexual harassment, online safety, exploitation, extremism, equality and how to seek help. Safeguarding information and reporting routes will be visible and accessible. Learner voice will inform risk assessment and improvement. Adjustments will be made for communication, literacy, SEND, language and trauma-related needs.

18. Employers, subcontractors and alternative provision

Contracts and service-level arrangements will define safeguarding responsibilities, referral routes, data sharing, staff checks, training, incident notification and CTA assurance rights. CTA remains accountable for learners funded or placed through CTA and will not assume that another organisation's policy is sufficient. Safeguarding due diligence will be completed before delivery and monitored through audits, learner contact, site visits, records and action plans. Serious or persistent failure may lead to suspension of starts, removal of learners or contract termination.

19. Monitoring, assurance and Ofsted readiness

- response times, referrals, outcomes and recurring themes;
- quality and timeliness of records and closure rationale;

- training completion and staff understanding;
- learner confidence in reporting and access to trusted adults;
- filtering and monitoring effectiveness and online incidents;
- safer-recruitment compliance and low-level concern patterns;
- subcontractor, employer and placement assurance;
- disproportionality, discrimination and the experience of learners with SEND or other additional vulnerability.

The Board will receive anonymised safeguarding assurance at least termly. CTA will evaluate impact rather than rely only on the existence of policies. Inspection evidence will be drawn from normal business records; separate documents will not be created solely for Ofsted. This policy will be reviewed annually and sooner after statutory change, a serious incident, learning review, inspection finding or material organisational change.

20. Key contacts and related procedures

Lead DSL: Sarah Ludlow, Director of Quality, email safeguarding@centraltraininggroup.com. Deputy DSL details and out-of-hours arrangements must be displayed at each centre and on the staff safeguarding page. Staff must use the local authority children's social care, adult safeguarding, LADO, Prevent and emergency contacts applicable to the learner's location. In an emergency call 999; for non-emergency police matters call 101.

Related documents: staff code of conduct; allegations and low-level concerns procedure; safer recruitment procedure; Prevent risk assessment and action plan; online safety and filtering and monitoring procedures; missing learner procedure; whistleblowing policy; behaviour and anti-bullying policy; SEND policy; data protection and retention policies; subcontracting policy; employer and placement assurance process; critical incident and suicide-safer procedures.

Appendix A: 2026/27 compliance update

Area	2026/27 requirement or gap	Update made
KCSIE 2026	All staff, including those not working directly with children, must read Part one in full. The former shorter Annex A route has been removed.	Updated training and reading requirement for all staff.
Working Together 2026	Introduces stronger Family Help, multi-agency, anti-racist, anti-discriminatory, hidden-harm and information-sharing expectations.	Added Family Help, challenge, bias and multi-agency practice.
Online safety and AI	2026 guidance strengthens online safety, information security and AI awareness.	Added annual filtering and monitoring review, defined ownership, deepfake and AI controls.
Prevent 2026	DfE practical guidance was refreshed in October 2026, including weaponry or explosives fixation and antisemitism.	Expanded indicators, referral and Channel arrangements.
Ofsted FE toolkit	The toolkit used from September 2026 evaluates safeguarding at whole-provider level and focuses on impact.	Added learner voice, impact measures, provider-wide assurance and normal-business evidence.
Adults at risk	The previous policy used a broad vulnerable adult definition without a full Care Act process.	Added section 42 consideration, consent, capacity and person-led practice.
Allegations and low-level concerns	The previous policy dealt briefly with allegations and omitted low-level concerns and pattern review.	Added harm threshold, LADO, case manager, low-level records, whistleblowing and referral duties.
Safer recruitment	The former four-point list was insufficient.	Added complete pre-employment, DBS eligibility, online search and ongoing suitability controls.
Employers and subcontractors	The former policy named partners in scope but did not define assurance.	Added contractual duties, due diligence, audits, escalation and learner removal.

Appendix B: Approval and revision record

Version	Date	Description	Approved by
2.0	1 September 2026	Full 2026/27 DfE, regulatory and Ofsted update	Board of Directors