Safeguarding and Child Protection Policy

The Hub provision

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This policy applies only to The Hub provision and its activities. It is written for The Hub's status and operating model; it does not present The Hub as a school or college.

Safeguarding is everyone's responsibility. The welfare and safety of the child or adult at risk take priority over internal reporting lines, reputation, contractual concerns or delay.

Document control

Version	Author / owner	Status and principal changes
3.1	Directors / DSL	Approved controlled version: current 2026 framework; named operational systems and allegation routes; tighter recruitment, training, information-sharing, record-retention and restrictive-intervention wording.

Approval record

Approved by	Status	Review cycle	Minute reference
Directors of The Hub Educational Services CIC	Approved	September 2027 or sooner when required	Internal approval record

Controlled-copy rule

The approved master is the controlled version. Printed or downloaded copies are uncontrolled and must be checked against the current master before use. The DSL reviews live contact routes and web links at least annually and after any notification of change.

Contents

Sections 1–12	Sections 13–20 and appendices
1. Purpose and status **2. Scope and definitions** **3. Safeguarding principles** **4. Legal and guidance framework** **5. Governance, leadership and responsibilities** **6. Safer workforce, induction and training** **7. Recognising concerns and vulnerabilities** **8. Responding to a concern or disclosure** **9. DSL assessment, referral and escalation** **10. Child-on-child abuse** **11. Missing, absent or leaving without agreement** **12. Concerns or allegations about adults working with children**	13. Low-level concerns and whistleblowing 14. Physical contact and restrictive intervention 15. Online safety and filtering and monitoring 16. Attendance and children absent from education 17. Information sharing, records and confidentiality 18. Partnership with learners, parents and commissioners 19. Safeguarding adults at risk 20. Complaints, quality assurance and review Appendix A: Key contacts Appendix B: Immediate action checklist Appendix C: Current legislation and guidance

1. Purpose and status

This policy sets the safeguarding arrangements for The Hub, a community-based alternative provision offering education, mentoring and related support. Its purpose is to prevent harm, identify concerns early, respond promptly, work effectively with statutory partners and create a safe culture in every Hub activity.

The Hub is not a school or college. Statutory duties written specifically for schools and colleges do not automatically apply to The Hub. The Hub nevertheless adopts the relevant safeguarding standards in Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026 and applicable local multi-agency procedures as contractual and organisational safeguards. Nothing in this policy removes or transfers the safeguarding duties of a commissioning or referring organisation.

This policy must be read with The Hub's safer recruitment, staff code of conduct, low-level concerns, whistleblowing, behaviour, attendance/missing learner, online safety, data protection, complaints, health and safety, and emergency procedures. If documents appear to conflict, the course that best protects the learner must be taken immediately and the conflict referred to the DSL for correction.

2. Scope and definitions

This policy applies to all Directors, employees, agency workers, contractors, volunteers, students on placement and anyone working for or on behalf of The Hub. In this policy, "staff" means all these people unless the context says otherwise. It applies at Hub bases, during outreach, transport arranged or provided by The Hub, off-site activities, online contact and any other activity carried out in The Hub's name.

Term	Meaning in this policy
Child / learner	A person under 18. "Learner" is used for people receiving Hub services; child protection duties apply to every learner under 18.
Adult at risk	A person aged 18 or over who has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves.
Safeguarding	Protecting children from maltreatment; preventing impairment of health or development; ensuring safe and effective care; and taking action so children have the best outcomes. It also includes preventing and responding to abuse or neglect of adults at risk.
Child protection	Part of safeguarding: action for a child who is suffering or likely to suffer significant harm.
Commissioner	The organisation responsible for arranging, funding or overseeing a learner's placement with The Hub.
Parent	A parent, carer or person with parental responsibility, as appropriate to the learner.

3. Safeguarding principles

- **Learner-centred.** The learner's safety, voice, identity and lived experience guide decisions.
- **Immediate and proportionate.** Action reflects the level and urgency of risk; internal processes never delay protection or referral.
- **Professionally curious.** Staff notice patterns, test assumptions, consider cumulative harm and do not accept explanations uncritically.
- **Inclusive and anti-discriminatory.** The Hub recognises that disability, special educational needs, communication differences, race, religion, sex, sexual orientation, gender reassignment, care experience and other circumstances may affect risk, disclosure and access to help.
- **Trauma-informed, not risk-blind.** Staff respond calmly and respectfully while maintaining boundaries, evidence and accountability.
- **Information shared to protect.** Relevant information is shared lawfully, securely, promptly and on a need-to-know basis.
- **No retaliation.** Learners and adults may raise concerns without fear of disadvantage.

4. Legal and guidance framework

This policy is aligned, as applicable to The Hub, with the current framework listed in Appendix C. The principal operational references are KCSIE 2026, Working Together to Safeguard Children 2026 and its statutory framework, local safeguarding-partnership procedures, current information-sharing advice, and current Leicestershire referral and LADO arrangements.

The legal minimum age for marriage or civil partnership in England and Wales is 18. Any arrangement, attempt or pressure involving a person under 18 is a safeguarding concern and may be a criminal offence. This is separate from the age of sexual consent and must never be used to minimise sexual exploitation or abuse.

Where guidance changes after approval, The Hub follows the current law, statutory guidance and local procedure. The DSL records the change and brings a formal policy update to the Directors without waiting for the annual review.

5. Governance, leadership and responsibilities

5.1 Directors of The Hub Educational Services CIC

- Approve this policy, scrutinise safeguarding effectiveness and ensure sufficient resources, training and cover.
- Appoint a suitably trained DSL and Deputy DSLs with authority, time and access to act immediately.
- Ensure conflicts of interest are managed and that safeguarding decisions can be taken independently of any person implicated in a concern.
- Receive anonymised safeguarding assurance, including themes, referrals, training, recruitment checks, attendance risks, online-safety controls, restrictive interventions and learning from incidents.
- Ensure any allegation about the DSL or a Director is handled through the independent route in section 12, without internal gatekeeping.

5.2 Designated Safeguarding Lead

The DSL has lead operational responsibility but does not carry safeguarding alone. The DSL:

- is available during Hub operating hours or ensures a named, trained Deputy DSL is available;
- receives, assesses and records concerns; checks the learner's immediate safety; and decides next action based on risk and current thresholds;
- makes or coordinates referrals to children's social care, police, Channel and other statutory services, and contacts the LADO where the harm threshold may be met;
- works with commissioners while preserving the right and duty to refer directly where necessary;
- ensures the learner's wishes and feelings are sought and recorded, without making protection dependent on consent;
- maintains secure, separate safeguarding records and ensures relevant information follows the learner promptly;
- provides advice, training, supervision and safeguarding updates; and monitors patterns and outcomes;
- escalates professional disagreement and records the reason for decisions, including decisions not to refer.

A Deputy DSL may take any urgent safeguarding action, including direct referral, when the DSL is unavailable, implicated or when delay would increase risk. No separate Director approval is required before a safeguarding referral.

5.3 All staff

- Read, understand and follow this policy, the staff code of conduct and the safeguarding information required for their role.
- Maintain professional boundaries; recognise concerns; respond safely to disclosures; make an accurate record; and report promptly to the DSL or a Deputy DSL.
- Call emergency services and/or refer directly to statutory services where immediate action is needed, the DSL route is unavailable, the concern involves safeguarding leadership, or the staff member reasonably believes the response is inadequate.
- Do not investigate, interview witnesses, search devices, promise confidentiality or confront an alleged person causing harm.
- Challenge unsafe or inappropriate practice and use whistleblowing routes when necessary.

5.4 Commissioners and partner organisations

The Hub provides commissioners with proportionate safeguarding assurances, attendance information, placement-review evidence and immediate notification of significant concerns, subject to the child's safety and lawful information sharing. The Hub and commissioner clarify lead responsibilities, emergency contacts and review arrangements before or at the start of placement. A contractual reporting route never replaces direct statutory referral where a threshold is met.

6. Safer workforce, induction and training

The Hub operates safer recruitment and ongoing suitability arrangements proportionate to role and in line with applicable law, DBS requirements, current KCSIE safer-recruitment standards and contractual requirements. Recruitment records and the single central record are maintained under the separate Safer Recruitment Policy.

- At least one appropriately trained person is involved in recruitment decisions for roles involving children.
- Required pre-employment checks are completed before a person begins regulated activity. Where current law or guidance permits a particular check to remain outstanding, the lawful basis, written risk assessment, supervision arrangements and target completion date are documented before the person begins work.
- Induction covers this policy, conduct, boundaries, low-level concerns, whistleblowing, online safety, information sharing, emergency action and the identity of safeguarding leads.
- All staff receive safeguarding and child-protection training appropriate to their responsibilities, refreshed regularly, with updates at least annually and whenever risk or guidance changes.
- The DSL and Deputy DSLs complete appropriate role-specific training at least every two years, or more frequently where required by current guidance, local safeguarding arrangements, commissioning requirements or identified need. Their knowledge and skills are refreshed throughout the year and at least annually.
- Training effectiveness is checked through supervision, scenarios, file audit and staff discussion, not through attendance records alone.

7. Recognising concerns and vulnerabilities

Abuse, neglect and exploitation may occur inside or outside the family, in person or online, and may be caused by adults or other children. A child may not recognise or describe what is happening. Staff consider signs in context, including change over time and information from several sources.

Category	Examples and possible indicators
Physical abuse	Injury, poisoning, burning, scalding, drowning, suffocation, fabricated or induced illness, unexplained or patterned injuries, changing explanations, fear of going home.
Emotional abuse	Persistent humiliation, threats, rejection, coercion, developmentally inappropriate expectations, exposure to abuse of another person, serious bullying, withdrawal, self-blame or sudden change in behaviour.
Sexual abuse	Forcing or enticing sexual activity, contact or non-contact abuse, exploitation, grooming, sharing or creating sexual imagery, sexualised behaviour, pain, pregnancy, sexually transmitted infection, gifts or unexplained money.
Neglect	Persistent failure to meet physical or psychological needs, including food, clothing, shelter, supervision, healthcare, education or emotional responsiveness; hunger, poor hygiene, tiredness, untreated needs or persistent absence.

Staff also remain alert to overlapping or contextual risks, including:

- child-on-child abuse; sexual violence and sexual harassment; bullying; prejudice-based harm; relationship abuse; and harmful sexual behaviour;
- domestic abuse, including the impact of seeing, hearing or experiencing its effects and child-to-parent or caregiver abuse;
- criminal exploitation, sexual exploitation, county lines, serious violence, trafficking, modern slavery and financial exploitation;
- online abuse, grooming, cyberbullying, coercion, sextortion, deepfakes and AI-generated or manipulated nude or semi-nude imagery;
- radicalisation and extremism; hate incidents; and risks linked to groups or networks;
- female genital mutilation (FGM), forced marriage, honour-based abuse and breast ironing;
- mental ill health, self-harm, suicidal thoughts, eating difficulties, substance misuse and trauma where these create or indicate safeguarding risk;
- homelessness, private fostering, young caring, bereavement, family imprisonment, missing episodes and children absent from education;
- abuse linked to faith or belief, witchcraft accusations, fabricated or induced illness and abuse of disabled children;
- additional vulnerability associated with being looked after or previously looked after, having an education, health and care plan, communication needs or limited trusted relationships.

Staff do not diagnose abuse. One sign may have another explanation, while absence of visible signs does not mean a child is safe. Any concern, uncertainty or “nagging doubt” is reported.

8. Responding to a concern or disclosure

8.1 Immediate response

1. Make the situation safe. If there is immediate danger, serious injury or a suspected crime in progress, call 999. Obtain urgent medical help when needed.
2. Listen calmly. Take the learner seriously; do not show shock, blame or disbelief. Use open prompts only where needed to clarify immediate safety.
3. Do not promise secrecy. Explain that information will be shared only with people who need it to help keep them safe.
4. Do not investigate. Do not ask leading questions, interview other people, confront the alleged person causing harm, or examine or copy sexual imagery.
5. Record promptly. Use the learner’s own words where possible, distinguish fact from professional opinion, include date, time, location, people present, observed injuries or behaviour, and action already taken. Sign and time the record.
6. Report immediately to the DSL or a Deputy DSL and record the concern on LearnTrek, The Hub’s secure safeguarding-recording system. Urgent concerns must also be communicated verbally and must not rely solely on an electronic notification being noticed.
7. Continue to support the learner and preserve evidence. Do not discuss the matter with people who do not need to know.

8.2 If the DSL route is unavailable or inadequate

Any staff member may contact children’s social care, police, emergency services or the LADO directly. They must do so where delay may increase risk, where a safeguarding lead is implicated, or where they

reasonably believe required action has not been taken. If safe, they then inform a non-implicated safeguarding lead and record what they did. A person who makes a referral does not need permission from a Director, manager, parent, commissioner or colleague.

8.3 Parents and consent

The Hub normally works openly with parents. The DSL decides when and how they are informed. Consent is sought where appropriate for support, but it is not required to share information or make a safeguarding referral when there is a lawful basis and a child needs protection. Parents are not contacted first if doing so could place anyone at greater risk, cause evidence to be lost, prejudice a statutory enquiry or conflict with advice from children's social care or police.

9. DSL assessment, referral and escalation

The DSL or Deputy DSL reviews the concern promptly, checks immediate safety, the learner's circumstances and history, cumulative and contextual risk, views and wishes, protective factors, needs of other children, and current local thresholds. The decision and rationale are recorded. Possible actions include pastoral support, Family Help, referral under section 17 or section 47 of the Children Act 1989, police contact, medical help, Channel referral or another specialist service.

A safeguarding referral is made without delay when the threshold may be met. Uncertainty is discussed with the relevant statutory service; it is not a reason to wait for proof. The Hub follows up a referral if no acknowledgement or response is received and uses local escalation procedures when professional disagreement remains.

Where staff have reason to believe an act of FGM appears to have been carried out on a girl under 18, the DSL considers immediate safeguarding action. A staff member who is a teacher for the purposes of section 5B of the Female Genital Mutilation Act 2003 and personally discovers this through a disclosure or observation must report to police under the statutory mandatory-reporting duty; the DSL supports but does not replace that individual duty. Concerns that FGM may be planned or at risk are referred through normal safeguarding routes.

Concerns about radicalisation are discussed with the DSL and may be referred to Channel or police. Emergency threats are reported to 999. The Hub's Prevent response remains proportionate, rights-respecting and attentive to vulnerability and exploitation.

10. Child-on-child abuse

Child-on-child abuse can occur between any children, including those of different ages, and may be a single incident or a pattern. It includes sexual violence and harassment, harmful sexual behaviour, physical abuse, relationship abuse, bullying, prejudice-based harm, initiation or hazing, exploitation, coercion, abuse in intimate relationships and abuse involving imagery or technology. It may occur outside the Hub and still affect safety within the provision.

The Hub has zero tolerance for abuse. "Banter", "part of growing up", consensual behaviour between children or the absence of a complaint are never used to dismiss a concern. Staff recognise that a harmed child may not describe themselves as a victim and a child alleged to have caused harm may also have unmet needs or be experiencing abuse.

10.1 Required response

1. Consider immediate safety and risk for the child harmed, the child alleged to have caused harm, and any other affected learners. Separate or supervise where necessary without creating punishment or stigma.
2. Provide prompt, proportionate support and preserve the child's education, privacy and trusted relationships. Avoid making the harmed child repeatedly recount events.
3. Notify the DSL immediately and create a clear safeguarding record. The DSL undertakes and records a child-centred risk and needs assessment and reviews it as circumstances change.
4. Notify the commissioner promptly, unless doing so would create risk or conflict with statutory advice. Agree practical safeguards, named responsibilities and review arrangements.
5. Refer to children's social care, police and/or specialist services without delay where the relevant threshold may be met. A criminal investigation does not remove the need for welfare support and risk management.
6. Inform parents at the appropriate time unless this would increase risk or conflict with statutory advice. Keep the needs and information of each child separate.
7. Record decisions, actions, rationale and outcomes. Review attendance, contact, locations, transport, online interaction and any retaliation or community risk.

Sexual violence and sexual harassment are managed in line with current KCSIE principles. Staff do not mediate alleged sexual abuse, force reconciliation, arrange restorative work without specialist risk assessment, or promise anonymity that cannot be maintained.

11. Missing, absent or leaving without agreement

There is no mandatory ten-minute waiting period before contacting police or emergency services. The response is immediate and based on the individual learner, the circumstances and a dynamic assessment of risk. Staff must not delay because a set number of minutes has not elapsed.

11.1 Immediate actions

1. Confirm what is known: when and where the learner was last seen, direction of travel, clothing, phone/contact, transport, known destinations, companions, trigger and immediate hazards.
2. Alert the DSL or senior person on duty and maintain appropriate supervision of other learners. Check the immediate Hub environment and other safe, proportionate locations without placing staff or others at risk.
3. Call 999 immediately if there is immediate or heightened concern—for example danger from traffic, water, weather, injury, self-harm or suicide, exploitation, abduction, violence, very young age, significant vulnerability, missing essential medication, or a suspected crime. Use 101 where police advice or assistance is required but there is no immediate emergency.
4. Notify parents and the commissioner promptly, unless police or safeguarding advice indicates that contact would increase risk. Follow any individual safety plan and agree who will take which action.
5. Record times, risk factors, searches, calls, advice, decisions and rationale contemporaneously. Continue reassessment until the learner is located and safely handed over or responsibility is formally transferred.

11.2 On return

Welcome the learner without blame, check immediate health and safety, offer a private conversation, seek medical or police help where required, and share relevant information with the DSL and commissioner. The DSL reviews the episode, patterns and push/pull factors; updates the safety and support plan; considers exploitation, trafficking, abuse, mental health and unmet needs; and seeks statutory or specialist support where indicated. A statutory return-home interview, where applicable, is independent of The Hub's supportive conversation and is coordinated with the responsible local authority.

12. Concerns or allegations about adults working with children

This section applies to any current or former member of staff, Director, contractor, volunteer or other person working for or on behalf of The Hub when they may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, including conduct outside work and transferable risk.

12.1 Report and protect without delay

Any concern that may meet the harm threshold is reported immediately to the named case manager in Appendix A. Vanessa Brooks is the normal case manager for an allegation about a member of staff, contractor or volunteer unless she is implicated, unavailable or has a conflict of interest. The child's immediate welfare is addressed at once by the DSL or a non-implicated Deputy DSL. The case manager contacts or refers to the LADO through the current Leicestershire route within one working day and sooner where risk requires it. Police and children's social care are contacted immediately where their thresholds may be met.

LADO contact or referral must not be delayed by an internal investigation, evidence-gathering exercise, disciplinary meeting, discussion between Directors, notification to the commissioner, or waiting for a separate Director-level decision. The role of the case manager is to coordinate, not to authorise whether the child can be protected. Only basic facts needed for immediate safety and correct routing are established before LADO advice.

If the DSL is unavailable or implicated, a Deputy DSL takes the necessary child-protection action. If Vanessa Brooks is unavailable, implicated or conflicted, Lorraine Bunney acts as case manager. Where an allegation concerns a Director, it is reported to Lorraine Bunney or, if she is unavailable, implicated or conflicted, directly to the LADO. It must not be managed by another Director who is personally involved or has a conflict of interest. Any staff member may contact the LADO, children's social care or police directly if an internal route is unavailable, conflicted or would cause delay.

12.2 Case management

- The case manager follows LADO and statutory-agency advice about information gathering, contact with the adult, parents and child, suspension or alternative safeguards, investigation and communication.
- The Hub does not promise confidentiality. Information is restricted to those who need it, and reporting restrictions and data-protection duties are observed.

- Suspension is not automatic. Any decision is risk-assessed, recorded, kept under review and considers alternatives without compromising safety or an external investigation.
- The outcome and learning are recorded. Referrals to the DBS and/or professional regulator are made when the legal criteria are met; compromise or settlement agreements never prevent a required referral.
- Malicious or deliberately false allegations are distinguished from unfounded, unsubstantiated or false allegations. A child is not sanctioned merely because an allegation is not substantiated.

13. Low-level concerns and whistleblowing

A low-level concern is any concern—however small, even if it is only a sense of unease—that an adult working for or on behalf of The Hub may have acted inconsistently with the staff code of conduct, including inappropriate conduct outside work, but the harm threshold is not clearly met. “Low-level” describes the threshold, not the importance of reporting.

Low-level concerns are reported promptly under the separate policy, recorded securely, reviewed for patterns and handled fairly. Where facts suggest the harm threshold may be met, the matter moves immediately to section 12 and LADO advice is sought; it is not retained as a low-level matter to avoid referral.

Staff may use The Hub’s whistleblowing procedure or contact an external prescribed body where they reasonably believe wrongdoing is being concealed or mishandled. No person is disadvantaged for raising a genuine concern in good faith. An attempt to suppress, discourage or retaliate against safeguarding reporting is itself a serious concern.

14. Physical contact and restrictive intervention

The Hub prioritises prevention, co-regulation, de-escalation, environmental adjustment and individual planning. Staff use ordinary, appropriate physical contact only where it is respectful, necessary for the activity, responsive to the learner’s communication and needs, and consistent with professional boundaries.

The Hub does not rely on statutory powers written specifically for school staff unless their legal application to The Hub and the circumstances has been confirmed. Current Department for Education restrictive-intervention guidance and recording principles are adopted as good-practice safeguards where relevant. Any emergency physical intervention must have a lawful basis, be necessary and proportionate to prevent immediate harm, and use the least restrictive option for the shortest necessary period.

- Restrictive intervention is never used as punishment, to secure compliance, because of refusal alone, or for staff convenience.
- Staff must not use any position or technique that creates an unacceptable risk to breathing, circulation or physical safety. They must not cover the mouth or nose, apply pressure to the neck, throat, chest or abdomen, or use pain to gain compliance. Prone restraint must not form part of The Hub’s planned practice. If a learner is unintentionally held on the ground, staff release or reposition to a safer alternative as quickly as possible.
- Emergency services are called when risk cannot be managed safely. Staff monitor physical and emotional wellbeing during and after any intervention and arrange medical assessment where indicated.

- The incident is reported immediately to the DSL/senior lead and recorded before the end of the working day where practicable, including antecedents, de-escalation, legal rationale, duration, people involved, injuries, medical action, learner's account and follow-up.
- Parents and the commissioner are informed as soon as practicable unless a safeguarding reason or statutory instruction prevents this. The DSL reviews safeguarding implications, including whether LADO or statutory referral is needed.
- A post-incident review includes the learner's view, staff support, plan changes, patterns, equality impact and steps to prevent recurrence. CCTV or other evidence is preserved lawfully.

Any planned approach involving restrictive practice requires an individual, multidisciplinary and regularly reviewed plan, informed by the learner and parent, lawful professional advice and commissioner agreement. A plan can never authorise disproportionate or unsafe force.

15. Online safety and filtering and monitoring

Online safety is part of safeguarding, not a separate technical issue. The Hub addresses content, contact, conduct and commerce risks across Hub devices, networks, accounts, communication and activities. This includes grooming, harassment, fraud, gambling, extremist material, exploitation, location sharing, coercive control, sexual imagery, deepfakes and generative-AI misuse.

- Access is filtered and monitored proportionately, with clear ownership, regular review and action on alerts. Controls do not replace supervision, education or professional curiosity.
- The DSL and technology lead understand the system, limitations, escalation route and how safeguarding alerts are reviewed and recorded. Directors receive assurance at least annually and after material change or incident.
- Staff use approved systems, maintain boundaries and never use personal accounts or devices for learner contact unless an authorised emergency arrangement is documented.
- Learners are taught how to seek help, report harmful contact, protect privacy and understand that manipulated or AI-generated imagery can still cause serious harm.

If nude or semi-nude imagery is reported, staff do not view, forward, copy, print or ask a learner to display it. They secure the device without searching it where necessary for immediate safety, report to the DSL and follow current UKCIS guidance and police/children's social care advice. Suspected indecent imagery of a child is not deleted unless authorised by police.

16. Attendance and children absent from education

Repeated or unexplained absence, non-attendance, late arrival or loss of contact can be a safeguarding warning, including neglect, exploitation, mental ill health, forced marriage, trafficking or risk within the placement. Attendance information is reviewed for patterns, not treated solely as administration.

- The Hub records attendance accurately and follows up absence on the day in accordance with the learner's agreed placement and safety plan.
- Emerging patterns or inability to make safe contact are reported to the DSL and commissioner promptly, with escalation based on risk rather than a fixed waiting period.
- The Hub shares relevant attendance and safeguarding information with the commissioner and statutory agencies and participates in placement reviews.
- Removing a learner from The Hub's internal roll or ending a placement does not end safeguarding responsibilities. Unresolved concerns are transferred and, where necessary, referred before closure.

17. Information sharing, records and confidentiality

The Hub processes safeguarding information under the UK GDPR and Data Protection Act 2018, as amended, including applicable provisions introduced by the Data (Use and Access) Act 2025. Data-protection law supports proportionate information sharing to safeguard children; it is not a barrier to protection. The DSL identifies and records an appropriate lawful basis and, where relevant, a condition for special-category data. Consent is not the only lawful basis.

The information-sharing duty in section 16LA of the Children Act 2004 takes effect on 30 September 2026. Where The Hub is within scope because it provides services under arrangements made by a relevant safeguarding organisation, it will comply with that duty and the accompanying statutory guidance. Where the statutory duty does not apply to a particular arrangement, The Hub adopts the guidance as good practice. Relevant information is shared promptly when it may help an in-scope recipient assess need or risk, make a decision, provide support or take safeguarding action, unless sharing would be more detrimental to the child than not sharing. The scope and legal basis are recorded.

17.1 Safeguarding records

- Safeguarding concerns and subsequent actions are recorded on LearnTrek, with access restricted according to role. Records are accurate, dated, timed, attributable, factual and clear about the source of information.
- Records include the concern, learner's words and wishes, assessment, advice, referrals, decisions and reasons, information shared, outcomes, follow-up and chronology.
- Corrections preserve the original entry and audit trail. Records are not altered to make later decisions appear contemporaneous.
- Information is retained, transferred and destroyed in accordance with The Hub's documented retention arrangements, applicable legal and regulatory requirements, commissioning and insurer requirements, and any preservation notice connected with an investigation, inquiry, complaint or claim.

17.2 Transfer and sharing

When a learner moves or a Hub placement ends, the DSL agrees secure and timely transfer of relevant safeguarding information with the commissioner and receiving organisation. Urgent risk information is shared before or at transition; the full record follows through a secure, traceable route appropriate to the parties' roles. The Hub keeps a record of what was transferred, when, to whom and confirmation of receipt.

Information is shared on a need-to-know basis, but "need to know" is interpreted in light of safety, not hierarchy. The learner and parent are told what will be shared where safe and practicable. Staff never guarantee confidentiality and do not discuss cases in public or informal channels.

18. Partnership with learners, parents and commissioners

The Hub explains safeguarding arrangements in accessible language and offers communication support where needed. Learners are told who they can speak to, how concerns are recorded and the limits of confidentiality. Their views are sought in decisions and reviews, while adults remain responsible for protective action.

Parents are treated as partners unless involvement would increase risk. The Hub provides clear, respectful information, considers family context and records disagreement. The Hub promptly informs

the commissioner of serious safeguarding concerns, missing incidents, significant child-on-child concerns, allegations affecting placement safety and other agreed events, subject to statutory advice and lawful information sharing.

For each placement, The Hub and commissioner record intended outcomes, the first review date, review frequency, responsible people, safety arrangements and evidence to be shared. Reviews consider the learner's and parent's views, attendance, progress, changing risk and whether the placement remains suitable.

19. Safeguarding adults at risk

For a learner aged 18 or over, The Hub applies the Care Act 2014 safeguarding principles and the relevant local adult-safeguarding procedure. Concerns may include physical, sexual, psychological or financial abuse, neglect, self-neglect, domestic abuse, discriminatory abuse, organisational abuse, exploitation, modern slavery or coercive control.

Immediate danger or suspected crime is reported to 999. Otherwise the concern is reported promptly to the DSL, who considers the adult's wishes, capacity, immediate safety and referral to the responsible local authority adult social care service. Information may be shared without consent where there is a lawful basis—for example risk to others, serious harm, coercion, crime or public-interest considerations. The rationale is recorded. Where a learner is under 18, children's safeguarding procedures apply even if they also receive adult services.

Before a learner reaches 18, The Hub agrees and documents with the commissioner and responsible local authority which adult-safeguarding arrangements, referral routes and information-sharing responsibilities will apply after transition.

20. Complaints, quality assurance and review

Safeguarding concerns are not delayed or treated only as complaints. The complaints process may run alongside safeguarding, LADO, police, social care, employment or regulatory action, with careful coordination to avoid prejudice or repeated interviews.

The DSL and Directors monitor implementation through file sampling, referral and outcome review, supervision, learner and parent feedback, staff knowledge checks, attendance and incident patterns, online-safety assurance, workforce checks and learning from complaints or external quality assurance. Personal information in governance reporting is minimised unless identification is necessary for action.

This policy is reviewed at least annually and sooner after a serious incident, learning review, material change in service, legislation, statutory guidance or local referral route. Each review checks every citation, contact, organisation name, cross-reference and web link; removes superseded content; records the change; and updates the controlled master and published copy together.

Appendix A: Key contacts

Staff must use the live route where a contact changes. Immediate danger: 999. A concern must never be delayed because one named person cannot be reached.

Role / service	Contact
Designated Safeguarding Lead	Vanessa Brooks | 07595 757197 | vanessa@thehub-cic.co.uk
Deputy DSL	Scott Brooks | 07495 761952 | scott@thehub-cic.co.uk
Deputy DSL	Emily Neale | 07713 131798 | emily@thehub-cic.co.uk
Deputy DSL	Eloise Flanders | 07538 937428 | dsl@thehub-cic.co.uk
Case manager for allegation about staff / volunteer	Vanessa Brooks, unless implicated, unavailable or conflicted; otherwise Lorraine Bunney. Immediate child-protection action may be taken by any available non-implicated DSL or Deputy DSL and must not await the case manager.
Allegation about Vanessa Brooks or a Director	Lorraine Bunney | directors@thehub-cic.co.uk | direct LADO/statutory contact if she is unavailable, implicated, conflicted or delay would result
Leicestershire First Response Children's Duty	0116 305 0005 (24 hours). Professionals use the current online Multi-Agency Referral Form (MARF).
Leicestershire LADO	Use the current online "Report to LADO" form for an initial referral. cfs-lado@leics.gov.uk is for follow-up after referral, not a substitute for the initial route.
Police	999 emergency | 101 non-emergency
NSPCC Whistleblowing Advice Line	0800 028 0285 | help@nspcc.org.uk

Before publication, the document owner must verify named internal contacts, telephone numbers and mailbox access. The current Leicestershire online route is authoritative if it differs from this appendix.

Appendix B: Immediate action checklist

Situation	Do now	Do not
Immediate danger / serious injury / crime in progress	Make safe; call 999; give first aid within competence; notify DSL/deputy; record.	Do not wait for a manager, parent, commissioner or a set time.
Disclosure or observed concern	Listen; reassure; explain	Do not investigate, lead, promise

Situation	Do now	Do not
	information sharing; record exact words; report immediately.	secrecy or confront anyone.
Child leaves / cannot be located	Dynamic risk assessment; search immediate safe areas; follow plan; call 999 immediately where risk is heightened; notify DSL, parent and commissioner as safe.	Do not apply a mandatory ten-minute wait.
Child-on-child concern	Secure immediate safety; inform DSL; risk and needs assessment; support all affected children; notify commissioner; statutory referral at threshold.	Do not dismiss as banter or force mediation/reconciliation.
Concern about an adult working with children	Protect child; report to case manager; LADO within one working day or sooner; statutory referral where needed.	Do not investigate internally or wait for Director-level authorisation.
DSL/case manager unavailable or implicated	Contact a non-implicated deputy/lead or statutory service directly; document action.	Do not let hierarchy or conflict of interest delay protection.

Appendix C: Current legislation and guidance

The current version at the live government or local-authority page takes precedence over a downloaded copy. Applicability depends on The Hub's legal status, the learner's age and the circumstances; standards directed to schools and colleges are adopted only where stated in this policy or contractually required.

Primary safeguarding guidance

- Keeping Children Safe in Education 2026 — in force from 1 September 2026; relevant standards adopted where applicable
- Working Together to Safeguard Children 2026 — multi-agency guidance and current statutory framework
- Information sharing advice for safeguarding practitioners — current DfE advice
- Information Sharing Duty statutory guidance — section 16LA Children Act 2004; applicable from commencement where The Hub is in scope
- Restrictive interventions, including the use of reasonable force in schools — used by The Hub as relevant good-practice guidance, not as evidence of school status or statutory school powers
- Sharing nudes and semi-nudes: advice for education settings — UKCIS guidance
- Prevent duty guidance — current statutory guidance where applicable

Local procedures and referral routes

- Report abuse or neglect of a child — Leicestershire County Council — First Response, MARF and emergency routes

- Report a childcare worker or volunteer — Leicestershire LADO — current LADO referral route
- Leicester, Leicestershire and Rutland safeguarding partnership procedures — current multi-agency procedures and thresholds

Principal legislation

- Children Act 1989 and Children Act 2004; Children and Social Work Act 2017.
- Children's Wellbeing and Schools Act 2026, including the section 16LA information-sharing framework where applicable.
- Education Act 2002 where applicable to commissioners and partner organisations; Education and Inspections Act 2006 provisions where legally applicable.
- Safeguarding Vulnerable Groups Act 2006; Protection of Freedoms Act 2012; Rehabilitation of Offenders Act 1974 (Exceptions) Order, as amended.
- Sexual Offences Act 2003; Female Genital Mutilation Act 2003, including the mandatory reporting duty; Serious Crime Act 2015.
- Forced Marriage (Civil Protection) Act 2007; Anti-social Behaviour, Crime and Policing Act 2014; Marriage and Civil Partnership (Minimum Age) Act 2022.
- Counter-Terrorism and Security Act 2015; Modern Slavery Act 2015; Domestic Abuse Act 2021.
- Equality Act 2010; Human Rights Act 1998.
- Data Protection Act 2018; UK General Data Protection Regulation; Data (Use and Access) Act 2025.
- Care Act 2014 for safeguarding adults at risk.

End of controlled document