



Safeguarding and Child Protection Policy

Policy Reviewed	Next Planned Review date	Signed
September 2025	September 2026 - or as required	<i>K.Wootton</i>
September 2026	<i>September 2027</i> - or as required	<i>K.Wootton</i>

Purpose and Scope

The purpose of this policy is:

- To protect children and vulnerable adults who receive New Pastures Care Farm Limited services
- To provide Parents / Carers, staff and volunteers with the overarching principles that guide our approach to child protection
- To state the responsibilities of the centre in relation to safeguarding children and vulnerable adults in response to current legislation and guidance.

This policy applies to anyone working on behalf of New Pastures Care Farm including senior managers, directors, paid staff, volunteers and 'Day Farmers' (learners)

Definitions

'Child' – The Children Act 1989 defines a child as "a person under the age of 18". This could therefore include:

- Any learner up to the age of 18
- Any other persons under the age of 18 participating in activities arranged by the Centre and on Centre premises

'Vulnerable Adult' – A person 18 years of age or older who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and vulnerable adults in England.

- Children Act 1989 and 2004 amendment-section 11
 - Section 175 of the Education Act 2002
 - Counter-Terrorism and Security Act 2015
 - Protecting children from radicalisation: the prevent duty – August 2015
 - Working Together to Safeguard Children 2026
 - Keeping children safe in education – September 2026
 - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
 - The Rehabilitation of Offenders Act 1974

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- School Staffing (England) Regulations 2009
- Sexual Offences Act (2003)

2026 statutory guidance update

This policy has been reviewed and updated for Keeping Children Safe in Education 2026, which is in force from 1 September 2026. It should be read alongside Working Together to Safeguard Children 2026 and the statutory Information Sharing guidance in force from 30 September 2026. All staff must read KCSIE 2026 Part One in full and follow New Pastures Care Farm Limited's safeguarding procedures.

Related Policies and procedures

- Health and safety
- Safer Recruitment
- Anti-bullying
- Code of conduct for staff and volunteers
- Induction / training
- Managing Allegations against staff and volunteers
- Whistleblowing
- Child Protection

We believe that:

- Children, young people and vulnerable adults should never experience abuse of any kind.
- We have a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to practise in a way that protects them.

We recognise that:

- The welfare of children and vulnerable adults is paramount
- All children and Vulnerable Adults whatever their age, culture, disability, gender reassignment, race, religion, language, sex or sexual orientation have the right to protection from harm abuse.
- The protection of children and vulnerable adults is a shared community responsibility.
- The abuse of children and vulnerable adults is a clear infringement of human rights.
- Some children and vulnerable adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, vulnerable adults and their parents / carers and other agencies is essential in promoting their welfare.

We will seek to keep children and vulnerable adults safe by:

- Valuing, listening to and respecting them
 - Appointing a Designated Safeguarding Lead, Deputy Safeguarding Lead and a lead board member for safeguarding.
 - Adopting Child Protection and safeguarding children / vulnerable adults best practice through our policies, procedures and code of conduct for staff and volunteers.
 - Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures.
 - Recruiting staff and volunteers safely, ensuring all necessary checks are made in accordance with our safer recruitment policy.
 - Recording and storing information professionally, securely and in line with GDPR 2018
 - Sharing information about safeguarding and good practice with children, vulnerable adults, their families, support staff, our staff and volunteers via posters, leaflets and discussions.
 - Ensuring that all staff and volunteers understand their role in relation to the safeguarding of children and vulnerable adults including an appropriate statement in job descriptions.
 - Using our procedures to manage any allegations against staff and volunteers appropriately
 - Using our safeguarding procedures to share concerns and relevant information with agencies who need to know and involving children, vulnerable adults, parents, carers, families and support workers appropriately.
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- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
 - Ensuring that we have effective complaints and whistle blowing measures in place
 - Ensuring that we provide a safe physical environment for children, vulnerable adults, people, staff and volunteers by applying health and safety measures in accordance with the law and regulatory guidance

Contact details Designated Safeguarding Leads

Name: Katie Wootton

Phone / email: 01926 614720 katie.wootton@newpasturescarerfarm.co.uk

Name: Sophia Baillie

Phone / email: 01206 614720 S.baillie@newpasturescarerfarm.co.uk

The Designated Safeguarding Lead and Single Point of Contact for Prevent Responsibilities

Cases of suspected abuse or allegations are appropriately referred to relevant agencies (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police).

- Advice and support is provided to staff on issues relating to safeguarding.
- A record of any safeguarding referral, complaint or concern is kept, even where that concern does not lead to a referral.
- Parents/carers/employers of children, young people or adults within New Pastures Care Farm Limited have access to the Safeguarding Policy.
- New Pastures Care Farm Limited works with appropriate partners to safeguard children, young people, and adults at risk of harm.
- Where staff discover that an act of FGM has been carried out it is reported to the police as our mandatory duty.
- Liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.
- Refresher training is attended at least every two years. The DSL should also undertake Prevent awareness training
- The DSL will be given the time, funding, training, resources, and support to meet the above responsibilities.
- When the DSL is absent, the Deputy Designated Safeguarding Lead, Stuart Wootton, will act as cover.
- The Deputy DSL is trained to the same level as the DSL.
- Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated. (Annex C; Paragraph 2 Keeping Children Safe in Education 2026
- The Designated Safeguarding Lead should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.

Raising a Concern

Where any member of staff has a concern the following procedure will apply:

- Safeguarding concern is reported to DSL. Emergencies are phoned through to the duty safeguarding officer
- The urgency of the safeguarding situation will be assessed within the hour.
- DSL will follow up - usually by making face-to-face contact with the learner, who the concern is about.
- Parents/carers called and notified if young person is under 18 or if we have concerns about their safety or vulnerability if over 18 unless to do so would place the child/young person/vulnerable adult at further risk or undermine the collection of Page 9 of 53 evidence e.g., obtaining forensic evidence.

- GP, Police, emergency services, Prevent, MASH referral or Mental Health Crisis team alerted if required.
- All actions and referrals are logged and followed up as relevant.

Spectrum of Support

- The DSL/Deputy DSL will decide on the most appropriate course of action and whether the concerns should be referred to Children's Social Care, referring to the Warwickshire Thresholds Guidance. If it is decided to make a referral to Children's Social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. All concerns, discussions and decisions will be recorded. NB: Informing parents/carer does not require seeking their consent to share the information with professionals who need to know.

The DSL/Deputy DSL will provide guidance on the appropriate action. Options will include:

- Managing any support for the child internally via the college's own pastoral support processes
- An Early Help Assessment or
- A referral for statutory services e.g., the child is or might be in need or suffering or likely to suffer significant harm

Early Help - If early help is appropriate, the DSL/Deputy DSL's will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services if the young person's situation does not appear to be improving or is getting worse.

Children in Need – A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based abuse, and extra-familial threats like radicalisation and criminal/sexual exploitation.

The DSL/Deputy DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.

Safeguarding Referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH)
- By using the online referral form found at: [Children's social care – Warwickshire County Council](#)

Warwickshire's Family Connect 01926 414144. Lines are open Monday to Thursday 8.30am - 5.30pm, Friday 8.30am - 5.00pm.

If you need to get in touch out of usual office hours, please contact the **Emergency Duty Team** immediately by calling **01926 886922**.

If you think that **a child is at immediate risk**, contact the Police immediately by calling **999**.

Prevent

The Prevent Strategy is part of the Government's overall counter terrorism strategy known as CONTEST. The aim of Prevent is to stop people being drawn into terrorism: terrorist groups who pose a threat to the UK, seek to radicalise and recruit people to their cause. Early intervention is at the core of Prevent, aiming to divert people away from being drawn into terrorist activity.

New Pastures Care Farm Limited has a statutory duty under Section 26 of the Counter Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism".

The Government has defined extremism in the Prevent Strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". British values are defined as: "democracy, the rule of the law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs".

NPCT recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our learners. Therefore, the Prevent agenda will be addressed as a safeguarding concern.

As part of our wider safeguarding responsibilities staff will be alert to:

- Disclosures by learners of their exposure to extremist actions, views or materials by others, both inside or outside of New Pastures Care Farm Limited, including in their homes, community groups, especially where learners have not actively sought these out
- Learners expressing opinions that indicate a support for terrorism or violence/ or for the leaders of terrorist organisations

- Attempts to impose extremist views or practices on others
- Possession of violent or extremist material in digital or hard format including possession of material relating to weapons and explosives
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendships or actions and request for assistance
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race or culture.

The above is not exhaustive and it should be noted that those behaviours listed above are not themselves indicators of criminality or criminal intent. Prevent is about looking for signs that an individual may be at risk and benefit from some supportive intervention.

Where there is a concern, the DSL/Deputy DSL's will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

You can email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related British Values

2025 Updates include:

- A stronger focus on online safety
- New tools for digital safety and risk management
- Attendance guidance
- Support for children in kinship care
- Inclusive language
- Safer recruitment
- Shore Space [Home - Shore](#)

Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education (2025) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any tutor who discovers an act of FGM appears to have been carried out on a learner under 18 must immediately report this to the police, personally. This is a statutory duty, and tutors will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL/Deputy DSL's and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL/Deputy DSL's and follow our local safeguarding procedures.

The duty for tutors mentioned above does not apply in cases where a learner is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

Any member of staff who suspects a learner is at risk of FGM or suspects that FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL/Deputy DSL's and follow our local safeguarding procedures.

Child on Child Abuse

We recognise that children are capable of abusing their peers.

Even if there are no reported cases of Child-on-Child abuse, such abuse may still be taking place and is simply not being reported. It should be recognised that it is more likely that girls will be victims and boys' perpetrators, however all Child-on-Child abuse is unacceptable and will be taken seriously. Staff should be aware that learners may not wish to be known as victim or perpetrator.

New Pastures Care Farm Limited has a zero-tolerance approach to abuse, it should never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child on Child abuse can take many forms. This can include but is not limited to:

- Child on Child
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Sexual violence and sexual harassment
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise.

Most cases of pupils hurting other pupils will be dealt with under the behaviour policy and Child on Child policy but this child protection and safeguarding policy will apply to any allegation that raises safeguarding concerns. This might include where the alleged behaviour:

- Is serious and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos/sharing of nudes or semi nudes.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- Whether the perpetrator has repeatedly tried to harm one or more other children; or
- Whether there are concerns about the intention of the alleged perpetrator

Child on Child abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender-based violence/sexual assaults, sharing of nudes/semi-nudes, domestic abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or

harmful sexual behaviour.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

[Report to CEOP](#)

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur Online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing Buttocks, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents

Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. 98. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats
- Upskirting - generally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. The response to a report of sexual violence or sexual harassment.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Dealing with a Disclosure

If a young person discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the Safeguarding Team without delay.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL/Deputy DSL's as soon as possible that you have done so.

Allegations or Low-level concerns about an adult working at New Pastures Care Farm Limited whether as a tutor, agency staff, support staff, other staff, volunteers or contractor

At New Pastures Care Farm Limited we recognise the possibility that adults working in the provision may harm children and young people.

Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young person, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The DSL must decide whether an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Examples of low-level concern behaviours include, but are not limited to:

- Taking photographs of young people on their mobile phone;
- Using inappropriate, intimidating or offensive language
- Meeting young person outside of the college setting for non-college reasons
- Being friends with learners on social media

If any staff has concerns about a member of staff or a volunteer, they should speak to the DSL. If the concern has been raised via a third party, the safeguarding team should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- To the individual involved and any witnesses.

The DSL/Deputy DSL will also inform the Designated Officer (formerly LADO) for the local authority. Low-level concerns should be recorded in writing. Records must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified. If any patterns are identified and then meet the criteria for an allegation, then it will be referred to the Designated Officer. The policies and processes will be revised and if necessary extra training delivered to minimise the risk of it happening again. Before contacting the Designated Officer, New Pastures Care Farm Limited will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation; being careful not to jeopardise any future police investigation.

For referrals regarding adults in education and other information on the role of the Designated Officer follow the link below: [Child safeguarding procedures - for professionals – Warwickshire County Council](#)

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child/young person.
- Possibly committed a criminal offence against/related to a child/young person.
- Behaved towards a child or children/young person or people in a way which indicates she/he would pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college)

What staff should do if they have concerns about safeguarding practices within New Pastures

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in New Pastures Care Farm Limited safeguarding arrangements.

Appropriate whistle blowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the senior leadership team. A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC run a whistleblowing helpline on behalf of the government, the number is 0800 028 0285 119. If staff members have concerns about another staff member, then this should be referred to DSL. If there are concerns about the DSL this should be referred to the Deputy DSL.

In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. She/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated, and immediately passed on to the Senior Person with Responsibility for Safeguarding. The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter. The Senior Person with Responsibility for Safeguarding will not investigate the allegation itself, or take written or detailed statements, but will consult with Designated Officer (formerly LADO) to see if a referral is required. If the allegation meets any of the criteria set out at the start of this section, contact should always be made with the Designated Officer (formerly LADO) without delay. If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the internal procedures.

The Senior Person with Responsibility for Safeguarding should, as soon as possible, following briefing from the Designated Officer inform the subject of the allegation. Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Record Keeping

When a young person has made a disclosure, the member of staff/volunteer should:

- Record the information as soon as possible after the conversation.
- Do not destroy the original notes in case they are needed by a court.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Record statements and observations rather than interpretations or assumptions.

No copies should be retained by the member of staff or volunteer. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. If a young person for whom New Pastures Care Farm Limited has, or has had, safeguarding concerns moves to another education establishment, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person. The DSL will contact the previous education establishment of new starters in September each year, requesting child protection files which may have not been received. Confidentiality and Information Sharing. Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children/young people.

The Working Together to Safeguarding Children (2018) statutory guidance states the following:

1. Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe.
2. All professionals responsible for children should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or

where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan). You should be alert to sharing important information about any adults with whom that child has contact, which may affect the child's safety or welfare.

3. Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child's care. 4. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

To ensure effective safeguarding arrangements:

- you should have arrangements in place that set out clearly the processes and the principles for sharing information. The arrangement should cover how information will be shared within your own organisation/agency; and with others who may be involved in a child's life
- all professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe. If a member of staff has concerns about a child's welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with local authority children's social care and/or the police. Staff should be particularly alert to the importance of sharing information when a child moves from one school to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.
- you should aim to gain consent to share information, but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if you have good reasons to do so, and believe that the sharing the information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, you should record who has been given the information and why.

Safeguarding young people raises issues of confidentiality that must be clearly understood by all staff/volunteers.

Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person's best interests.

Staff/volunteers who receive information about young people and their families in the course of their work should share that information only within appropriate professional contexts. Timely information sharing is essential to effective safeguarding. Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

Communication with Parents/Carers

Where appropriate, we will discuss any concerns about a child/young person with their parents./carers. The DSL/Deputy DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL/Deputy DSL. If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care before doing so. In the case of allegations of abuse made against other young people, we will normally notify the parents/carers of all the young people involved.

Additional Safeguarding Requirements – KCSIE 2026

Safeguarding in an Alternative Provision Setting

New Pastures recognises that learners attending alternative provision may have additional or different safeguarding vulnerabilities. Safeguarding arrangements will take account of each learner's individual circumstances, attendance, behaviour, relationships, home and community context, online experiences and information provided by parents/carers, commissioners, schools, local authorities or other professionals.

Staff must remain alert to contextual safeguarding risks, including risks arising outside the provision, and must not assume that a concern is unrelated to education because it occurs away from the setting. Relevant information must be shared promptly with the DSL so that the wider context can be considered.

Online Safety and Technology

New Pastures recognises that safeguarding risks can arise online as well as offline. Staff will be alert to online abuse, grooming, exploitation, cyberbullying, harmful or illegal content, online radicalisation, coercion, non-consensual sharing of images, cybercrime and other technology-enabled harms.

The provision will maintain appropriate filtering and monitoring arrangements and will ensure that safeguarding concerns identified through technology or monitoring are acted upon and recorded. Staff and learners will be provided with appropriate information about online safety.

Artificial Intelligence

Staff will remain alert to safeguarding risks associated with generative artificial intelligence and other AI-enabled technologies. This includes the creation or manipulation of images or other content, impersonation, harmful or sexualised content involving children, online exploitation, coercion, cyber risks and misuse of personal information.

Any safeguarding concern involving AI-generated or manipulated content will be reported to the DSL and managed under the relevant safeguarding, online safety and child-on-child abuse procedures.

Attendance and Children Missing Education

Attendance is a safeguarding matter. Unexplained, persistent or concerning absence, repeated lateness, patterns of non-attendance or a sudden change in attendance may indicate that a learner is experiencing abuse, neglect, exploitation, bullying, family difficulties or another safeguarding risk.

Staff must report concerning attendance patterns to the DSL in accordance with the attendance policy. The DSL will consider the wider safeguarding context and liaise with parents/carers, commissioners, local authority services and other relevant professionals where appropriate.

Young Carers and Learners with Medical Conditions

Staff will consider whether caring responsibilities may affect a learner's attendance, punctuality, wellbeing, educational engagement or access to support. Young carers may require early help or additional safeguarding consideration.

Staff must also avoid assuming that changes in behaviour, mood, presentation or attendance are solely attributable to a learner's SEND or medical condition. Concerns must be explored and referred in accordance with safeguarding procedures where appropriate.

Child-on-Child Abuse – Updated Principles

Any child or young person can be a victim or perpetrator of child-on-child abuse, regardless of sex, gender, age, disability, SEND or other characteristics. New Pastures will not dismiss harmful behaviour as “banter”, “part of growing up” or similar.

Child-on-child abuse may include bullying, discriminatory abuse, sexual violence, sexual harassment, harmful sexual behaviour, abuse in intimate personal relationships, coercive or controlling behaviour, physical abuse, exploitation, serious youth violence and the making or sharing of nudes or semi-nudes.

Safeguarding concerns may also involve AI-generated, digitally manipulated or otherwise altered intimate images. Such concerns will be treated seriously and referred to the DSL without delay.

Information Sharing and Record Keeping

New Pastures will follow the current statutory information-sharing guidance. Data protection must not be treated as a barrier to sharing information where sharing is necessary and lawful to safeguard a child.

Safeguarding records must clearly record the concern, actions taken, decisions made, the rationale for decisions and outcomes where known. Information will be shared securely and on a need-to-know basis, while recognising that safeguarding law and statutory guidance may permit or require information to be shared without consent.

Where information is withheld, the reason for doing so must be recorded.

DSL Cover and Availability

New Pastures will ensure that effective arrangements are in place for safeguarding leadership whenever learners are attending the provision. At least one appropriately trained member of the safeguarding team will be available to respond to safeguarding concerns.

The DSL has lead responsibility for safeguarding and child protection. Appropriate safeguarding activity may be delegated to trained deputies, but ultimate lead responsibility remains with the DSL.

Prevent and Anti-Discriminatory Practice

New Pastures recognises that safeguarding includes challenging racism, discrimination, misogyny, sexism, homophobia, disability-related discrimination and other derogatory or harmful behaviour. Staff will consider whether discriminatory or hateful behaviour is a safeguarding concern and will report concerns to the DSL where appropriate.

The provision will continue to comply with the Prevent duty and will follow current Prevent and Channel guidance.

Operation Encompass and Multi-Agency Information

Where New Pastures receives information from police, local authority or other safeguarding partners about incidents that may affect a learner's safety or welfare, the information will be considered by the DSL and acted upon in accordance with local arrangements and current statutory guidance. Information will be recorded and shared appropriately with professionals who need to know.

Low-Level Concerns About Adults

All safeguarding concerns about adults working with learners must be taken seriously and recorded appropriately, including concerns that do not meet the threshold for an allegation. Low-level concerns will be reviewed for patterns or cumulative

concerns.

Where the circumstances meet the threshold for an allegation, or where consultation is required, the appropriate local authority Designated Officer/LADO arrangements will be followed without delay. Staff should not investigate allegations themselves.

Staff Knowledge of KCSIE 2026

All staff, including staff who do not work directly with learners, must read Keeping Children Safe in Education 2026 Part One in full and follow this policy and the provision's safeguarding procedures. The shorter former Annex A version should not be used as a substitute for Part One.

Safeguarding training and updates will be recorded as part of staff induction and ongoing professional development.

Current statutory guidance considered: Keeping Children Safe in Education 2026; Working Together to Safeguard Children 2026; Information Sharing to Safeguard Children and Young People (statutory guidance in force from 30 September 2026).