Nested Learning Safeguarding Policy

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Review: At least annually, and sooner following a serious safeguarding incident, a material service change, or a relevant change in law or statutory guidance

Designated Safeguarding Lead (DSL): Founder & CEO (see https://nestedlearning.uk/contact/)

1. Purpose
   Nested Learning is committed to safeguarding children and adults at risk who may come into contact with our people, services or technology.
   Safeguarding is everybody's responsibility. Concerns can arise in physical settings, online, through communications, during remote learning or through information disclosed in the course of using an educational service.
   Our approach is preventive, proportionate and centred on the welfare of the person at risk.
   We seek to create working and learning environments in which people are treated with dignity, concerns can be raised safely, warning signs are taken seriously and appropriate information is shared promptly with those who need to act.
2. Scope
   This policy applies to:
   Nested Learning employees, workers, directors, contractors and consultants;
   anyone acting on behalf of Nested Learning;
   learners and users who interact with Nested Learning services;
   customer and partner activities where Nested Learning has a safeguarding role;
   online tutoring, AI-assisted learning, demonstrations, pilots, training and support; and
   information received by Nested Learning that gives rise to a reasonable safeguarding concern.
   A child is a person under the age of 18.
   An adult at risk is an adult who has care and support needs, is experiencing or at risk

of abuse or neglect, and as a result of those needs may be unable to protect themselves from the risk or experience of abuse or neglect.

3. Our safeguarding principles

   Nested Learning will:

   place the welfare and safety of children and adults at risk at the centre of safeguarding decisions;

   treat safeguarding concerns as capable of arising in any setting, including online;

   provide clear reporting and escalation routes;

   act promptly where there is a risk of harm;

   listen to the person concerned and take their views into account where appropriate;

   avoid discrimination and recognise that some people can face additional barriers to being heard or believed;

   share safeguarding information when it is necessary, proportionate and lawful;

   maintain suitable records of concerns and actions;

   use safer recruitment and vetting where the role and law require it;

   maintain professional boundaries in interactions with learners;

   work with customer safeguarding leads and statutory agencies where appropriate; and

   learn from incidents, complaints and emerging risks.

   No commercial, reputational or operational consideration takes priority over a serious and immediate risk to a person's safety.

4. Legal and statutory framework

   The relevant legal framework depends on the person, activity and setting.

   Nested Learning will have regard, where applicable, to:

   the Children Act 1989;

   the Children Act 2004;

   Working Together to Safeguard Children 2026;

   the Safeguarding Vulnerable Groups Act 2006 and associated Disclosure and Barring Service requirements;

   the Care Act 2014 and Care and Support Statutory Guidance for adult safeguarding;

   the Mental Capacity Act 2005, where relevant to decisions involving an adult who may lack capacity;

   the Sexual Offences Act 2003;

   the Counter-Terrorism and Security Act 2015 and Prevent requirements where those duties apply;

   the Data Protection Act 2018 and UK GDPR in relation to safeguarding information; and

   other relevant criminal, education, employment and information-sharing law.

   For schools and colleges, Keeping Children Safe in Education 2025 remains in force until 31 August 2026 and Keeping Children Safe in Education 2026 comes into force

on 1 September 2026.

Nested Learning is not, merely by supplying educational technology, a school, college, local authority or care provider. Duties that attach specifically to those bodies remain with them.

However, where Nested Learning works on behalf of such an organisation, carries out a function to which a legal duty applies, or accepts safeguarding requirements through contract, it will meet the applicable duty and support the partner's safeguarding arrangements.

5. Designated Safeguarding Officer

   The Designated Safeguarding Officer is the central contact for safeguarding concerns:

   nestedlearning.uk/contact

   The DSO is responsible for:

   receiving and assessing safeguarding concerns;

   deciding whether immediate protective action is required;

   ensuring appropriate records are made and retained;

   consulting or referring to children's social care, adult safeguarding services, the police, a Local Authority Designated Officer or another competent authority where appropriate;

   liaising with a customer or partner Designated Safeguarding Lead where relevant;

   ensuring that concerns involving staff, contractors or people in positions of trust are handled appropriately;

   identifying whether safer recruitment, access restrictions or other controls are needed; and

   reviewing safeguarding arrangements and lessons learned.

   The DSO does not replace emergency services or statutory safeguarding authorities.

6. What to do if someone is in immediate danger

   If a child or adult is in immediate danger, or there is a serious and immediate risk of harm:

   contact the emergency services on 999;

   take any immediate action that is safe and reasonable to reduce the risk; and

   notify the school, college or university DSO as soon as possible and then notify the Nested Learning DSO;

   Do not delay emergency action while waiting for an internal response.

7. How to report a safeguarding concern

   A concern that is not an immediate emergency should be reported promptly to:

   nestedlearning.uk/contact

   A report should contain factual information where available, including:

   who is involved;

   what happened or what was disclosed;

the date and time;
the context in which the concern arose;
any immediate risk;
what action has already been taken; and
the reporter’s contact details where appropriate.
The person reporting should distinguish clearly between what they directly observed, what another person said and any inference or opinion.
They should not conduct their own investigation.

8. Responding to a disclosure
If a child or adult at risk makes a disclosure:
listen calmly;
take the disclosure seriously;
do not express disbelief or blame;
do not ask leading or unnecessary questions;
do not promise absolute confidentiality;
explain, where appropriate, that information may need to be shared to help keep them or another person safe;
record the disclosure accurately and as soon as possible; and
report it to the DSO promptly.
Where possible, record the person’s own words rather than replacing them with an interpretation.

9. Concerns about a member of staff, contractor or person in a position of trust
Concerns about the conduct of anyone working for or on behalf of Nested Learning must be reported promptly.
This includes conduct that may:
have harmed a child or adult at risk;
indicate a risk of harm;
amount to a criminal offence;
breach professional boundaries;
suggest that the person may be unsuitable to work with children or adults at risk; or
constitute a lower-level concern which, alone or as part of a pattern, requires attention.
Nested Learning may restrict access to systems, learners or information while a concern is assessed.
Where the legal threshold is met, the matter may be referred to the police, local authority safeguarding services, the Local Authority Designated Officer or another competent authority.
If the concern relates to the DSO, or the reporter cannot reasonably use the internal route, the concern should be raised directly with the relevant local authority safeguarding service, the LADO where applicable, or the police.

10. Safer recruitment and DBS checks

    Nested Learning will use safer recruitment measures where a role creates relevant safeguarding risk.

    This may include:

    identity and right-to-work checks;

    employment or activity history;

    references;

    role-specific safeguarding questions;

    appropriate supervision and access controls; and

    Disclosure and Barring Service checks where the role is eligible and the check is lawful and proportionate.

    Nested Learning will not claim or request a level of DBS check for which a role is not legally eligible.

    Where regulated activity is involved, the requirements of the Safeguarding Vulnerable Groups Act 2006 and related legislation will be followed.

11. Professional boundaries and online learning

    Online education requires the same professional boundaries as face-to-face activity. Anyone working for Nested Learning who communicates directly with a child or adult at risk must use approved systems and follow agreed communication arrangements.

    They must not:

    move safeguarding-relevant contact to an unauthorised private account or channel;

    seek unnecessary personal information;

    encourage secrecy;

    form an inappropriate personal or dependent relationship;

    share sexual, exploitative, discriminatory or otherwise inappropriate content; or

    arrange unauthorised contact outside the agreed learning or support context.

    Where a customer organisation has stricter rules, those rules should be followed unless they conflict with law.

12. AI, automated systems and safeguarding

    Nested Learning develops and uses AI-assisted educational technology. AI systems can support learning, but they are not safeguarding professionals and must not be treated as autonomous safeguarding decision-makers.

    Where an AI system, transcript, moderation process or user report indicates a possible safeguarding concern:

    the signal should be treated as information requiring appropriate human judgement, not as proof;

    serious concerns should be escalated to the DSO or the customer's safeguarding lead as appropriate;

    emergency risks should be handled through emergency or statutory services;

    records should be limited to what is relevant and lawful; and

technical systems should not be described as guaranteeing that abuse, self-harm, exploitation or other harm will always be detected.
Nested Learning services are not a substitute for emergency services, social care, clinical care or professional crisis support.

13. Online safety
    Nested Learning will consider foreseeable online risks relevant to its services, including:
    harmful or inappropriate content;
    sexual exploitation or grooming;
    bullying, harassment and abuse;
    coercion and manipulation;
    fraud or impersonation;
    radicalisation and extremist content;
    inappropriate sharing of personal information;
    misuse of images, audio or recordings; and
    risks created by generative AI or automated interaction.
    Controls may include access controls, content safeguards, reporting routes, moderation, logging, human review and customer-level configuration, according to the service and risk.
14. Adults at risk
    Adult safeguarding should be person-centred and proportionate.
    Nested Learning will have regard to the six principles used in Care Act statutory guidance:
    empowerment;
    prevention;
    proportionality;
    protection;
    partnership; and
    accountability.
    Where an adult has capacity to make the relevant decision, their wishes should normally carry significant weight.
    However, information may still need to be shared without consent where there is a lawful safeguarding basis, for example where another person is at risk, a serious crime may have occurred, coercion is involved or another legal duty requires action.
15. Equality and safeguarding
    All children and adults at risk are entitled to appropriate protection.
    Nested Learning recognises that vulnerability and barriers to disclosure can be affected by disability, communication needs, race, religion or belief, sex, sexual orientation, gender reassignment, age, care experience, social circumstances and other factors.

Safeguarding action must not be weakened by stereotypes or assumptions.
Reasonable adjustments should be considered where needed so that a person can understand, communicate and participate effectively.

16. Information sharing, confidentiality and records
    Safeguarding information will be handled carefully, but confidentiality is not absolute.
    Data-protection law does not prevent necessary and proportionate information sharing for safeguarding where there is a lawful basis.
    Nested Learning will seek to:
    share information only with people who need it for a legitimate purpose;
    record what was known, what was decided and why;
    avoid unnecessary or speculative personal information;
    protect safeguarding records from inappropriate access; and
    retain information for an appropriate period having regard to legal, contractual and safeguarding requirements.
    Where consent is not sought or is overridden, the reason should be recorded where appropriate.
17. Working with customers and partners
    Where Nested Learning provides services to an education or training organisation, safeguarding should be treated as a shared operational responsibility with clear boundaries.
    Before or during delivery, the parties should establish where relevant:
    who the customer's safeguarding lead is;
    how concerns are reported;
    what information can be shared;
    who makes referrals to statutory agencies;
    what happens outside normal operating hours;
    how allegations about staff or contractors are handled; and
    what local or sector-specific rules apply.
    Nested Learning will follow agreed customer safeguarding routes where they are lawful and do not delay necessary protective action.
18. Prevent and radicalisation
    Nested Learning is not automatically subject to the statutory Prevent Duty merely because it supplies educational services.
    Where the Prevent Duty applies to Nested Learning through the function being performed, or where a customer has lawful and relevant Prevent requirements, we will support those arrangements.
    Concerns about radicalisation should be handled as safeguarding concerns and escalated proportionately.

19. Training and awareness

    People whose work creates safeguarding responsibilities must receive information or training appropriate to their role.

    This should enable them to:

    recognise common indicators of abuse, neglect, exploitation and online harm;

    understand professional boundaries;

    respond appropriately to a disclosure;

    know how to report a concern;

    understand that they should not investigate concerns themselves; and

    recognise when immediate emergency action is required.

    Training and briefing will be refreshed according to role, risk and changes in law or guidance.

20. Whistleblowing and speaking up

    Nested Learning expects concerns about unsafe practice, failures to act or attempts to conceal safeguarding matters to be raised.

    A person who raises a genuine concern should not be penalised for doing so.

    Where an internal route is inappropriate or ineffective, concerns may be raised directly with the relevant safeguarding authority, regulator or police.

21. Relationship between this policy and legal duties

    Nested Learning seeks to work within the confines of this policy where reasonable and legally necessary.

    This does not weaken any statutory duty.

    Where the law, statutory guidance applicable to the activity, or a lawful contractual requirement sets a higher or more specific standard, that requirement takes precedence.

    Where a duty belongs to a customer organisation rather than Nested Learning, we will support the customer's compliance while remaining responsible for safeguarding matters within our own control.

22. Review

    This policy will be reviewed at least annually and sooner where there is:

    a serious safeguarding incident;

    a material change in the law or statutory guidance;

    a significant change to Nested Learning's services or use of AI;

    a new category of learner or user presenting different safeguarding risks;

    a material customer or regulator requirement; or

    evidence that existing arrangements are not working effectively.