POLICY – Child Protection and Safeguarding Education – England

Policy Author	Clifford Isabelle, Head of Safeguarding Laura Dickie, Head of Policy
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Policy Approver	Jo Dunn, Group Executive Director of Compliance, Quality and Regulation – Children's Services
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Version No.	001
Policy Level	England Education
Staff groups affected	All England Education Services

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. The proprietor retains ultimate accountability for ensuring that the Independent School Standards, including safeguarding requirements, are met. The Proprietor Representative, Regional Lead and other named internal roles provide delegated assurance, challenge and operational oversight; these arrangements do not transfer or displace the proprietor's accountability.

This safeguarding and child protection policy will be reviewed at least annually and updated where needed. It will also be reviewed sooner following any statutory or regulatory change, serious incident, safeguarding practice review, learning review or other identified safeguarding learning.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.

Andrew Sutherland
Representative, Proprietor- Cambian Group
February 2026

Sean Di Sora
Headteacher
February 2026

Term	Definition
Children	Under 18's we support
Learners	Any pupil/student
Adults we support	Over 18's we support
Staff	Employees, contractors
Volunteers	Volunteers/work experiences
External professionals	Social workers, medical professionals, advocates, therapists, teachers etc
Stakeholders	Parents, families, neighbours etc
Internal partner services	HR, L&D, CQR, Finance etc
Regulator(s)	OFSTED, CIW, CIS, Estyn, ES
Divisional Director	MDs/Directors
Regional Manager	Refers to the senior leader with regional or multi service oversight - including roles such as Regional Manager, Responsible Individual (RI), Nominated Individual (NI), Service Directors, or Exec Lead etc. ** The job title varies across the business ** Where statutory/regulatory duties apply to a specific role, these duties remain unchanged and must be fulfilled by the appropriate role in line with legislation and regulation.
Service Manager	Refers to the senior operational leader responsible for the day-to-day running of a service, including roles such as Home Manager, Registered Manager, Head Teacher, Principal, or Exec Head depending on service type and regulatory context. ** The job title varies across the business ** Where statutory or regulatory duties apply to a specific role, these duties remain unchanged and must be fulfilled by the appropriate role in line with legislation and regulation.
Service	Home/school/fostering

Organisation	Children's services brands that are part of the CareTech organisation
Group	Children's services
Division	Directors portfolio
Region	Regionals portfolio

Glossary – Use of Terms

The organisation uses standard umbrella terms across its policies to support consistency and clarity across different service types, structures and nations.

These terms describe levels of responsibility, not job titles, and are intended to help staff understand accountability without requiring policies to list every role used across the organisation.

Where a policy applies to a specific nation, regulated service or statutory framework, any statutory roles and legal duties named within that policy take precedence over glossary terms and must be fulfilled by the appropriately appointed individual in line with legislation and regulation.

1. Linton School

Linton School is an independent special school who caters for children and young people with social, emotional and mental health needs.

We are located in Freckleton, near Preston, and therefore benefit from some amazing outdoor space where we develop an extensive outdoor curriculum which includes farming, equestrian, horticulture and small animal care. The school provides full time education for up to 12 male or female students aged between 8 - 18 years old. Linton School aims to nurture pupils by offering quality learning experiences so that they can be the best they can be. Pupils are given the opportunity to learn and develop in a supportive and creative environment, ensuring that they feel safe and happy to progress and achieve.

2. Purpose

This policy applies to Linton School and sets out the aims:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

It provides a universal framework and outlines the expectations that apply to:
• Staff
• Senior leaders
• Learners
• Visitors and contractors (where relevant)

This policy enables our site to meet statutory duties, regulatory requirements, uphold safeguarding responsibilities, comply with data protection standards, and maintain high-quality provision.

3. Local Adaptation Requirement

Some sections in this policy are marked *Adapt Locally* *and give examples of* potential information services may want to update. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, local contacts).

All local additions are:
• Accurate
• Up to date
• Consistent with national legislation and regulator guidance
• Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

4. Legal and Regulatory Context (Universal)

Linton School is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendix I**, which summarises the legal, regulatory and inspection requirements for education services in England.

5. Policy status and use

This is the single safeguarding and child protection policy for Linton School. It is designed as the first point of reference for all staff, agency staff, volunteers, contractors and visitors. It combines the core requirements from the previous safeguarding policies into one overview and places detailed subject guidance into annexes for further reading. This Policy takes into consideration the KCSIE 2026 revisions and the safeguarding implications of the Crime and Policing Act 2026.

Where a concern relates to a child under 18, staff must follow the child protection route. Where a concern relates to a student aged 18 or over, staff must follow the adult safeguarding route, applying the Care Act 2014 and Mental Capacity Act 2005 principles described in this policy. Where the age or status of the individual is unclear, staff must seek immediate advice from the DSL or deputy DSL and act to keep the person safe.

- This policy must be read, understood and followed by all staff.
- The annexes support the main policy but do not replace the immediate duty to report concerns.
- In an emergency, staff must call 999 and then inform the DSL as soon as possible.

6. Key contacts and safeguarding management team

Role	Name	Telephone	Email
Principal / Headteacher	Sean Di Sora	01772 957062 07840 803896	Sean.disora@lintonschool.co.uk
Proprietor representative / Regional Lead	Andrew Sutherland / Richard George	07701314378 / 07586038104	Andrew.Sutherland@caretech-uk.com / Richard.george@cambiangroup.com
DSL	Sean Di Sora	01772 957062 07840 803896	Sean.disora@lintonschool.co.uk
Deputy DSL	Andy Cavill	01772 957062	Andy.cavill@lintonschool.co.uk
Deputy DSL	Steph White	01772 957062	Steph.white@lintonschool.co.uk
Safeguarding Governor / Link	Richard George	07586038104	Richard.george@cambiangroup.com
Local Authority Children Social Care / MASH	Lancashire County Council	0300 123 6720 0300 123 6722 (out of office hours)	

Local Authority Designated Officer (LADO)	Lancashire Team / Laura Dalton (Blackpool)	01772536694 / 01253477541	lado.admin@lancashire.gov.uk / lado@blackpool.gov.uk
Police: emergency / non-emergency		999 / 101	

All local contact details must be completed before publication. Staff must know where to find this policy, how to contact the DSL team during the school day, and what arrangements apply outside normal hours or during off-site provision.

7. Introduction and legal framework

This policy is written for schools in England and reflects statutory guidance and legislation relevant to safeguarding children and adults at risk. It should be adapted locally to include the relevant Local Safeguarding Children Partnership, Local Safeguarding Adults Board, local authority procedures and internal reporting systems.

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Working Together to Improve School Attendance 2024/2025
- Care Act 2014
- Mental Capacity Act 2005
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Disclosure and Barring Service requirements
- Human Rights Act 1998
- Equality Act 2010 and Public Sector Equality Duty
- Data Protection Act 2018 and UK GDPR
- Prevent Duty Guidance 2023

This policy applies to safeguarding concerns arising inside or outside school, online, during transport, in residential or attached accommodation, during work experience, alternative provision, remote education and any school activity.

8. Aims

The aims of this policy are to ensure that staff:

- Understand that safeguarding is everyone's responsibility;
- Know how to identify indicators of abuse, neglect, exploitation and harm;
- Know the difference between a concern, disclosure, allegation and low-level concern;
- Respond calmly and effectively to concerns and disclosures;
- Record concerns accurately and promptly using the agreed system;
- Know when and how to report to the DSL, external agencies and police;
- Understand the different routes for under-18 child protection and over-18 adult safeguarding;
- Take a child-centred and person-centred approach that listens to the child or student's voice;

- Understand the importance of early help / family help / early intervention, professional curiosity and multi-agency working.

9. Safeguarding culture and principles

Safeguarding permeates all aspects of school life. Staff maintain an attitude of "it could happen here" and are expected to exercise professional curiosity, respectfully exploring inconsistencies, unexplained changes, repeated patterns or situations that do not appear right, rather than accepting explanations at face value.

- The culture is proactive, reactive and reflective: risks are anticipated and reduced; concerns are responded to quickly; and learning is used to improve practice.
- Learners are listened to, taken seriously and supported to express their wishes and feelings.
- Safeguarding decisions are proportionate, evidence-informed and made in the best interests of the learner. .
- Staff avoid assumptions based on age, disability, sex, sexual orientation, gender identity, race, religion, communication needs or previous behaviour.
- All concerns are recorded, even where no referral is made, so that patterns can be identified.
- Leadership, governance and supervision are used to test whether safeguarding practice is effective.

10. Voice of the Learner

The school is committed to ensuring that the wishes, views and feelings of learners are sought, heard and appropriately considered. Safeguarding practice will be child-centred and person-centred, recognising that every individual has the right to be listened to and involved in decisions affecting their safety and wellbeing.

Staff should be particularly mindful of barriers to communication and disclosure, including SEND, disability, mental health needs, trauma, language barriers, cultural factors and previous experiences of professionals.

11. Definitions: safeguarding, child protection and adult safeguarding

11.1 Safeguarding children

Safeguarding is the action taken to promote the welfare of children and protect them from harm. This includes protecting children from abuse, neglect and exploitation, preventing impairment of health or development, ensuring safe and effective care, and enabling children to have the best outcomes.

11.2 Child protection

Child protection is part of safeguarding. It is the responsive process used when a child is suffering, or is likely to suffer, significant harm.

11.3 Adult safeguarding

Adult safeguarding applies to students aged 18 and over who have care and support needs, are experiencing or are at risk of abuse or neglect, and are unable to protect themselves because of those needs. Adult safeguarding aims to stop abuse wherever possible, prevent harm and support adults to have choice and control.

11.4 Mental Capacity Act principles (applies to Adults)

- Presume capacity unless it is established otherwise.
- Support the person to make their own decision wherever possible.
- Do not treat an unwise decision as evidence of lack of capacity.
- Where a person lacks capacity for a specific decision, act in their best interests.
- Use the least restrictive option that protects rights and freedoms.

12. Roles and responsibilities

12.1 Divisional Director and Regional Lead

The proprietor retains ultimate accountability for ensuring that safeguarding arrangements meet the Independent School Standards and applicable statutory guidance. The Regional Lead provide delegated strategic assurance, challenge and oversight of safeguarding. They ensure there is a whole school approach, that policies and systems are effective, that leaders and staff are trained, and that safeguarding practice is reviewed through quality assurance.

12.2 Safeguarding Governance and Oversight

On behalf of the proprietor, the Divisional Director and Regional Lead will seek assurance that safeguarding arrangements are effective and operating as intended. This delegated assurance role does not remove or transfer the proprietor's ultimate accountability.

Regular safeguarding assurance reports should include, analysis of:

- safeguarding referrals and outcomes;
- child protection activity;
- attendance and persistent absence trends;
- children missing education;
- online safety incidents;
- child-on-child abuse incidents;
- complaints and whistleblowing concerns;
- low-level concerns and allegations;
- safer recruitment compliance;
- staff training compliance;
- audit findings;
- emerging safeguarding risks and themes.

Divisional Directors and Regional Leads will use this information to provide appropriate challenge, support continuous improvement and ensure safeguarding remains effective.

Safeguarding information should be presented in a manner that enables effective scrutiny, challenge and assurance by Divisional Directors and Regional Leads.

12.3 Headteacher

The Headteacher ensures this policy is implemented, staff understand their responsibilities, safeguarding training is completed, the DSL is supported, and allegations against staff are managed with the appropriate external agency.

12.4 DSL and deputies

The DSL takes lead responsibility for safeguarding and child protection, including online safety and filtering/monitoring oversight. The DSL should be given the appropriate level of time, funding, training, resources and support to carry out the role effectively and fulfil the responsibilities set out within Keeping Children Safe in Education 2026.

Deputy DSLs are trained to the same standard but the ultimate lead responsibility remains with the DSL. A DSL or deputy must be available during school hours for staff to discuss concerns and appropriate arrangements will also be in place for activities taking place outside normal operating hours.

A DSL or deputy DSL must also manage referrals to children's social care, adult safeguarding for concerns relating to adult learners, Prevent/Channel, DBS and police as required; maintain accurate safeguarding records and chronologies; work with social care, health, police, local authority, virtual school and other partners; support staff and provide safeguarding advice; lead safeguarding training and awareness; monitor themes including attendance, online safety, alternative provision and low-level concerns; ensure safeguarding records are transferred securely, promptly and separately from the main learner file when a learner moves setting, and that receipt of records is confirmed wherever possible.

12.5 Mental Health Lead

The Mental Health Lead supports the promotion of positive mental health and emotional wellbeing across the school. They may contribute to early identification, support and signposting for learners experiencing mental health difficulties. Staff should recognise that mental health concerns can, in some cases, be an indicator of abuse, neglect, exploitation, trauma or other safeguarding issues. Concerns relating to a learner's safety or welfare must always be reported to the DSL in line with this policy.

12.6 All staff, volunteers and contractors

All adults working in or on behalf of the school/college are responsible for safeguarding. They must read this policy, attend training, follow the staff code of conduct, report concerns immediately and never assume someone else will act.

12.7 Early help and family help

Early help and family help prevent concerns escalating. Staff must report emerging concerns to the DSL even where the threshold for statutory intervention may not appear to be met. Early indicators may include changes in behaviour, attendance, appearance, engagement, friendships, online activity, family circumstances or emotional presentation.

- For under-18s, the DSL considers Early Help / Family Help and children social care thresholds.

- For over-18s, the DSL considers adult safeguarding, care and support needs, consent, mental capacity and advocacy.

Early Help / Family Help does not remove the need to make an immediate referral where a child or student is at risk of significant harm or serious abuse.

The school works collaboratively with partners to ensure children and families receive support at the earliest opportunity.

Lancashire Early Help

The Early Help Assessment and Plan (EHA/EHP) is an 'assessment and planning tool'.
We use it to support children with significant and complex additional needs who need specialist support from across education, health and social care.
This includes children who have:

- difficulty communicating
- sensory or physical difficulties
- complex health needs.

The EHA/EHP was introduced in September 2021 to replace the Common Assessment Framework (CAF).

Your Family's Early Help Assessment is available to all practitioners and professionals working with children, young people, and their families across Lancashire.
Working alongside families from a holistic, strength-based approach when areas of support are first identified will stop escalation towards crisis and the need for more intensive and specialist intervention.
Through the Early Help Assessment, Plan, and reviews via Team Around the Family meetings, the wider partnership of services can provide families with the right support at the right time.

your-familys-early-help-assessment-practitioner-guidance.pdf

13. Looked After / Previously Looked After Children and Care Experienced Adults

The school recognises that looked after children, previously looked after children and care-experienced learners may face increased safeguarding vulnerabilities and additional barriers to education, stability and wellbeing.

The DSL will work closely with social workers, carers, local authorities, Virtual School Heads and other relevant professionals to ensure children and young people receive appropriate safeguarding support and that their needs are considered in decision-making and planning.

Staff should also remain alert to situations where a child may be living in a private fostering or kinship care arrangement and should seek advice from the DSL where concerns arise or arrangements are unclear.

Additionally, particular consideration will be given to learners with a social worker and those who have previously had a social worker, acknowledging that these individuals may face increased safeguarding and educational vulnerabilities.

Head of Virtual School Blackpool – Helen Piggott
Head of Virtual School Lancashire – Vanessa Nice

14. Recognising abuse, neglect, harm and exploitation

Abuse, neglect and exploitation are rarely standalone events. Multiple issues may overlap and may be physical, sexual, emotional, psychological, financial, discriminatory, organisational, domestic, online or exploitative. Staff must look beyond the presenting issue and consider the wider context.

Type of concern	Examples	Possible indicators
Physical abuse	assault, rough handling, misuse of restraint, fabricated illness	injuries, fear, inconsistent explanations, avoidance
Sexual abuse / harmful sexual behaviour	contact or non-contact abuse, sexual harassment, coercion, image sharing	sexualised behaviour, distress, STIs, withdrawal
Emotional / psychological abuse	threats, humiliation, coercive control, isolation	low self-esteem, anxiety, self-harm, changes in behaviour
Neglect / self-neglect	unmet basic care, unsafe living, poor supervision	hunger, poor hygiene, tiredness, deterioration
Exploitation	CSE, CCE, county lines, modern slavery, trafficking	missing episodes, gifts, older associates, secrecy
Domestic abuse	violence, coercive control, exposure to abuse at home	fearfulness, attendance changes, protective behaviours
Financial / material abuse	theft, coercion, misuse of money or benefits	unexplained lack of money, anxiety about finances
Online harm	grooming, cyberbullying, harmful content, AI-generated abuse	device secrecy, distress after online use, image-based abuse
Discriminatory abuse	racism, sexism, homophobia, transphobia, disability-related abuse	isolation, targeted bullying, attendance change
Serious violence	Gang involvement, weapon carrying, organised criminal activity, criminal exploitation	Increased absence, unexplained injuries, aggression, possession of weapons, unexplained gifts or money, association with risky peers or adults

Radicalisation and extremism	Exposure to extremist ideologies, recruitment into extremist groups, online radicalisation	Intolerance, fixation on extremist content, sudden changes in beliefs or behaviour, social isolation, concerning online activity
Honour-based abuse	Abuse linked to perceived family or community honour, honour-based violence, coercive control	Fear of family members, restricted freedom, sudden changes in behaviour, unexplained absence, reluctance to discuss home circumstances
Forced marriage	Pressure, coercion, threats or abuse relating to marriage	Anxiety about forthcoming travel, sudden withdrawal from education, concerns expressed by the learner, increased restrictions at home
Female Genital Mutilation (FGM)	Known, suspected or planned FGM	Planned extended absence abroad, discussions about special ceremonies, anxiety regarding travel, behavioural changes following travel
Missing episodes / missing education	Missing from home, care or education, unexplained absence, repeated missing incidents	Persistent absence, disengagement from education, unexplained whereabouts, increased vulnerability to exploitation
Substance misuse	Misuse of drugs, alcohol, prescription medication or other substances	Intoxication, behavioural changes, declining attendance, risk-taking behaviour, association with concerning peer groups
Mental health and emotional wellbeing concerns	Self-harm, suicidal ideation, trauma responses, significant emotional distress, emotional dysregulation	Withdrawal, low mood, self-injury, significant anxiety, risk-taking behaviour, sudden changes in presentation
AI-enabled abuse and exploitation	AI-generated sexual imagery, deepfakes, impersonation, manipulation, online exploitation	Distress linked to online activity, coercion, image-based abuse, reputational harm, unusual online behaviours

Mental health concerns may be both safeguarding concerns in their own right and indicators that a learner has experienced, or may be at risk of, abuse, neglect, exploitation, trauma or other adverse experiences. Staff are not expected to diagnose mental health conditions but should remain alert to behaviours that may indicate a safeguarding concern. All concerns relating to self-harm, suicidal ideation, suicide attempts, significant emotional distress or deterioration in a learner's mental wellbeing must be treated as safeguarding concerns and reported to the DSL without delay.

This list is not exhaustive and more detailed guidance is provided in the Appendix section.

Staff must report any concern, however small, to the DSL.

15. Responding to concerns and disclosures

When a learner discloses abuse or a staff member has a concern, the priority is to listen, reassure and act. Staff must not investigate, promise confidentiality or delay reporting.

- Listen carefully and allow the child or student to speak in their own words.
- Remain calm; do not show shock or disbelief.
- Use open prompts only, such as “tell me”, “explain” or “describe”.
- Do not ask leading questions or attempt to gather evidence.
- Explain that the information must be shared with the DSL to help keep them safe.
- Record the words used by the child/student as accurately as possible.
- Report immediately to the DSL or deputy DSL. If unavailable and risk is immediate, contact emergency services or the relevant local authority route.
- Do not discuss the concern with anyone who does not need to know.

15.1 Immediate danger

If anyone is in immediate danger or a crime is in progress, staff must call 999. The DSL must be informed as soon as it is safe to do so.

15.2 Referral pathway and Timescales

Concern relating to Learner Under 18 (Child)

Stage	Timescale
Staff member reports concern to DSL/Manager	Within 1 hour
DSL reviews concern and determines next steps	Same working day
Referral made to Children's Social Care (where threshold is met)	Immediately / without delay once the referral threshold is identified, in accordance with the local safeguarding partnership referral process
Child at immediate risk of significant harm	Immediate CSC/Police referral
Safeguarding actions implemented	Immediately and ongoing
Records completed and uploaded to safeguarding system	As soon as possible following the concern
Outcome, monitoring and review	Ongoing until concerns are resolved

Concern relating to Learner Over 18 (Adult)

Stage	Timescale
Staff member reports concern to DSL/Headteacher	Within 1 hour

Referral made to Adult Safeguarding Team	Within 24 hours
Adult Safeguarding Team screening/initial management decision	Within 5 working days
Child at immediate risk	Immediate CSC/Police referral
Safeguarding actions implemented	Immediately and ongoing

16. Recording, information sharing and confidentiality

All concerns must be recorded promptly on the school safeguarding recording system, Behaviour Watch . Records should be factual, dated, timed, signed or attributable, and should separate fact from opinion. Records must include actions taken, decisions made, referrals, outcomes and rationale.

- Do record the learner's own words where possible.
- Do record body maps for visible injuries in line with local procedure.
- Do **not** take photographs on personal devices.
- Do **not** delete or alter records.
- Do **not** promise confidentiality where safeguarding is involved.
- Information is shared lawfully, proportionately and in the best interests of safeguarding.

16.1 Information Sharing Principles

Effective safeguarding relies on timely and appropriate information sharing.

Staff should never allow concerns about data protection legislation to prevent information sharing where there is a safeguarding concern.

Information sharing decisions should be:

- Necessary
- Proportionate
- Relevant
- Accurate
- Timely
- Securely recorded

Where information is shared, the rationale for decisions should be documented in accordance with local procedures and organisational requirements.

Safeguarding records and systems must be protected through appropriate access controls. Staff must only access safeguarding information where required for their role and must comply with organisational information security expectations.

17. Multi-agency referrals and escalation

The DSL will normally lead and coordinate safeguarding referrals and determine the appropriate referral route in consultation with the Headteacher where required. However, any member of staff may make a direct referral to local authority children's social care or the police where necessary, particularly where a child is at risk or appropriate action is not otherwise being taken. The DSL should be informed as soon as practicable. Referrals may include children's social care, adult safeguarding for concerns relating to adult learners, the Local Authority Designated Officer (LADO) for allegations concerning adults working with children, police, Prevent/Channel, health, mental health services, education welfare, virtual school or other local safeguarding partners.

Under-18 concerns: follow local safeguarding children partnership procedures and MASH/ children social care thresholds.

Over-18 concerns: follow Local Safeguarding Adults Board procedures, adult safeguarding thresholds, mental capacity and consent considerations.

Allegations concerning staff, volunteers, contractors or supply staff working with children: where the harm threshold may be met, follow the Local Authority Designated Officer (LADO) process and seek LADO advice before beginning an internal investigation. Adult safeguarding procedures apply separately to safeguarding concerns involving learners aged 18 or over and must not be used in place of the LADO route for allegations concerning adults working with children.

Professional disagreement: escalate through local safeguarding escalation procedures and record the rationale.

17.1 Professional Challenge and Escalation

Constructive professional challenge is an important part of safeguarding practice.

Where staff or leaders disagree with decisions made by another professional or agency and believe a learner remains at risk, concerns should be escalated through the appropriate safeguarding escalation procedures until a satisfactory resolution is achieved.

Disagreements and escalation actions should be clearly documented.

18. Child on Child abuse / Learner on Learner Abuse

The school has a zero-tolerance approach to abuse. Abuse is not banter, having a laugh, part of growing up or "boys will be boys". Child on child abuse and learner on learner abuse can happen inside or outside school/college and online, and may be one-off or repeated bullying, including cyberbullying, prejudice-based and discriminatory bullying; sexual violence, sexual harassment and harmful sexual behaviour; abuse in intimate personal relationships; physical abuse, initiation or

hazing; coercion, exploitation, image sharing, AI-generated abusive imagery or online harassment; group-based exploitation, gang association or disinformation-driven harassment.

Victims, alleged perpetrators and witnesses must all be safeguarded. The DSL will consider the needs, age, power imbalance, vulnerabilities, SEND, communication needs and wider context of everyone involved.

Detailed guidance is in Annex B.

19. Attendance, Children Absent from Education and Children Missing Education

Attendance is a safeguarding matter. Absence, persistent absence, severe absence, unexplained absence, lateness, missing lessons, being absent from education or becoming a child missing education can indicate abuse, neglect, exploitation, mental health concerns, radicalisation, family difficulties, online harm or other safeguarding risks.

Additional Vulnerability Factors

Particular attention should be given to attendance concerns involving children who:

- Have a social worker
- Have previously had a social worker
- Are looked after or previously looked after
- Are young carers
- Have SEND
- Have identified mental health needs
- Have experienced exploitation
- Are subject to child protection or child in need plans

Attendance concerns for these groups should be reviewed alongside wider safeguarding information.

- Attendance and safeguarding systems must be reviewed together.
- Patterns are considered: specific days, lessons, staff, peers, transport or family circumstances.
- Parents/carers are contacted for under-18s in line with attendance procedures.
- For over-18s, contact and consent arrangements must be clear, with safeguarding action taken where risk is identified.
- The DSL must be alerted when thresholds of concern are met.
- Local authority CME procedures must be followed where a child is missing education.

Detailed guidance is in Annex G and the Attendance Policy.

20. Online safety, filtering and monitoring

Online safety is part of safeguarding. The school recognises that online safety is a whole-school safeguarding responsibility and not solely a technical or ICT matter.

The DSL has lead oversight of online safety and understands the filtering and monitoring systems in place. The school/college limits exposure to harmful content without unreasonably restricting teaching and learning.

Filtering blocks access to harmful and inappropriate content.

Monitoring identifies concerning activity through supervision, network logs, device monitoring or third-party systems.

Filtering and monitoring arrangements are reviewed at least termly and after significant incidents.

Staff receive online safety training, including risks from generative AI, harmful content, grooming, sexual imagery, cyberbullying, radicalisation and exploitation.

Concerns identified through digital systems are reported to the DSL and recorded.

Detailed guidance is in Annex C.

20.1 Governance of Filtering and Monitoring

The Divisional Director and Regional Lead will receive appropriate assurance regarding the effectiveness of filtering and monitoring arrangements.

This includes oversight and responsibility of:

- The effectiveness and types of filtering systems in place
- Monitoring alerts and trends
- Who responds to alerts
- How concerns are escalated
- Emerging online risks
- Staff training
- Significant incidents
- System limitations
- Actions taken following identified concerns

Reviews should be documented and used to inform ongoing improvement.

21. Preventing radicalisation and the Prevent Duty

The school recognises its duty to prevent people from being drawn into terrorism. Radicalisation can occur online or offline and may overlap with exploitation, identity-based grievance, isolation, mental health concerns or harmful peer networks. Staff must report concerns to the DSL, who will consider Prevent advice and Channel referral where appropriate.

Staff follow the Preventing Extremism and Radicalisation Policy for further guidance, and have completed training through the government Prevent Training program.

22. SEND, vulnerability and equality

Learners with SEND communication needs, care experience, mental health needs, medical conditions, young carer responsibilities, disabilities, LGBTQ+ identities, experiences of discrimination, trauma histories or other vulnerabilities may face additional barriers to recognising risk, communicating concerns or accessing support.

The school recognises that homelessness, housing instability and temporary accommodation may also increase safeguarding vulnerability and may impact a learner's ability to access support, maintain attendance and achieve positive outcomes.

Staff must not assume that behaviour, presentation or communication difficulties are solely attributable to SEND, disability or personal circumstances without first considering whether safeguarding concerns may exist.

The school also recognises that learners who are questioning their gender may experience additional vulnerability and should receive appropriate safeguarding support, with decisions made on an individual basis, taking account of welfare, safety, parental involvement, legal requirements and statutory guidance.

Staff must

- Provide accessible communication and advocacy where needed.
- Consider whether additional reasonable adjustments are required.
- Be alert to masking, dependency on adults, isolation, bullying, exploitation and communication barriers.
- Challenge racism, sexism, homophobia, transphobia, ableism and other discriminatory harm.

23. Alternative Provision

Where learners access alternative provision, vocational placements, off-site education or other commissioned services, the school retains overall responsibility for safeguarding oversight.

Appropriate arrangements must be in place to ensure:

- Information is shared effectively between providers
- Safeguarding concerns are reported promptly
- Attendance is monitored
- Suitability checks are completed where required
- Safeguarding arrangements are regularly reviewed

The DSL should maintain regular communication with relevant providers to ensure risks are understood and managed appropriately.

This includes work experience placements, where appropriate safeguarding checks, supervision arrangements and information sharing processes must be in place.

24. Joint Working with Homes, Care and Support Services

Where learners live in homes, fostering services, supported accommodation, healthcare services or other regulated provision within the organisation, safeguarding arrangements must be coordinated across services.

The DSL will work collaboratively with relevant managers, safeguarding leads and professionals to ensure:

- Key safeguarding information is shared appropriately
- Risk assessments are aligned where necessary
- Safeguarding plans are coordinated
- Emerging risks are identified promptly
- Responses remain consistent across services

Information sharing will always be undertaken in accordance with safeguarding duties, data protection legislation and the best interests of the learner.

This integrated approach helps ensure learners receive safe, coordinated and effective support.

25. Staff allegations, low-level concerns and whistleblowing

25.1 Allegations that may meet the harm threshold

Any concern or allegation that a staff member, volunteer, contractor or supply staff member working in or on behalf of the school has harmed a child, 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, must be reported immediately to the Headteacher. Where the concern or allegation is about the Headteacher, it must be reported to the regional lead. Where there is a conflict of interest, the matter must be reported directly to the Local Authority Designated Officer (LADO) as required. Where the harm threshold may be met, LADO advice must be sought and the LADO process followed before any internal investigation is commenced. Adult safeguarding procedures apply separately to safeguarding concerns involving adult learners and do not replace the LADO route for allegations concerning adults working with children.

All concerns or allegations with LADO involvement are recorded on the LADO log on BehaviourWatch.

25.2 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the harm threshold. Examples include being over-friendly, favouritism, inappropriate one-to-one

situations, humiliating children/students, using personal devices contrary to policy, or concerning conduct outside work.

All low-level concerns must be reported without delay in accordance with the school locally agreed route, which may permit initial reporting to the DSL/Headteacher. The Headteacher retains ultimate oversight and decision-making responsibility for low-level concerns.

Concerns are recorded on the low-level concern log on BehaviourWatch and reviewed for patterns, including cumulative concerns relating to the same individual.

Where information indicates that the harm threshold may be met in relation to an adult working with children, the Headteacher must consult the LADO and follow the allegations process.

Detailed guidance is in Annex E.

25.3 Whistleblowing

Staff must raise concerns about unsafe practice, poor safeguarding culture, misconduct or failure to follow safeguarding procedures. Concerns should be raised without delay through the Whistleblowing Policy, local leadership routes or external routes where appropriate. No staff member should suffer detriment for raising a genuine safeguarding concern.

25.4 Safer recruitment and the single central record

The school follows safer recruitment procedures that deter and prevent unsuitable people from working with children and students. Recruitment checks must be completed before appointment and recorded on the Single Central Record where applicable.

- Identity, address and right to work checks;
- DBS and barred list checks as required;
- Prohibition from teaching and management checks where relevant;
- Overseas checks and certificates of good conduct where applicable;
- Employment history, gaps and reasons for leaving;
- Verified references and safeguarding questions;
- Qualification and professional registration checks;
- Online checks where relevant and proportionate;
- At least one safer-recruitment-trained panel member;
- Agency and contractor assurance checks.

Detailed guidance is in Annex F.

26. Staff Conduct

All staff, volunteers, contractors and agency staff are required to comply with the *Professional Boundaries and Conduct Policy.*

Any behaviour that breaches, or may breach, expected standards of conduct must be addressed promptly through safeguarding, disciplinary or management processes as appropriate.

27. Serious untoward incidents and police contact

The DSL/Headteacher must ensure serious incidents are escalated internally and externally in line with the *Serious Untoward Incident Policy,* regulatory requirements and local safeguarding arrangements. Police should be contacted when a crime may have been committed, when there is immediate danger, when evidence may be lost, or when advice is needed on criminal matters.

28. Review, training and quality assurance

This policy is reviewed at least annually and updated where needed. It will also be reviewed sooner following any statutory or regulatory change, serious incident, safeguarding practice review, learning review or other identified safeguarding learning. The DSL and leadership team monitor implementation through training records, supervision, audits, safeguarding reports, attendance analysis, online safety reviews, low-level concern trends, recruitment checks and case file quality assurance.

- All staff receive induction and regular safeguarding updates.
- DSLs and deputies receive role-specific training and supervision.
- Divisional Directors receive safeguarding training to provide effective challenge.
- Staff understanding is checked through briefings, supervision, scenarios and audits.
- Lessons learned are used to improve policy, practice and training.

29. Local Safeguarding Arrangements

This policy must be adapted to reflect local safeguarding arrangements before implementation.

The policy must not be approved or published until all local safeguarding contacts, referral pathways and escalation procedures have been completed, including:

- Local Safeguarding Children Partnership details
- Local Authority Children's Services
- MASH arrangements
- Local Safeguarding Adults Board
- · Adult Safeguarding Team (for safeguarding concerns involving adult learners)
- · Local Authority Designated Officer (LADO) (for allegations concerning adults working with children)
- Local police safeguarding contacts
- Prevent referral pathways

Leaders must ensure local arrangements remain accurate and are reviewed regularly.

30. Mobile Phones

Use of Mobile Phones and Smart Devices

Purpose

This Local Operating Procedure (LOP) sets out how the school manages the possession and use of mobile phones and other smart devices by pupils during the school day.

The procedure is designed to:

- Promote a calm, safe and focused learning environment.
- Safeguard pupils and staff.
- Minimise distraction and disruption to learning.
- Reduce risks associated with cyberbullying, online harm, inappropriate photography and social media misuse.
- Comply with Department for Education (DfE) statutory guidance on mobile phones in schools and the school's Behaviour, Safeguarding, ICT Acceptable Use and Child Protection policies.

Scope

This procedure applies to:

- All pupils.
- All teaching and support staff.
- Volunteers and contractors working within the school.
- Visitors whilst on school premises.

The term mobile phone includes:

- Smartphones.
- Internet-enabled phones.
- Smart watches.
- Tablets with communication capability.
- Any device capable of making calls, sending messages, accessing social media, recording images, audio or video, or receiving notifications

In accordance with current DfE statutory guidance, the school operates as a **mobile phone-free environment during the school day**.

Any exception must be authorised by the Headteacher or Designated Safeguarding Lead (DSL) and recorded where appropriate

Arrangements for Bringing Phones to School

Where parents permit pupils to bring mobile phones for travel to and from school:

On Arrival

Pupils must:

1. Switch mobile phones off or place them in flight mode.
2. Hand them immediately to staff on arrival to be stored securely:

During the Day

Phones must remain inaccessible to pupils.

At the End of the Day

Phones may only be accessed after dismissal from the school day or once pupils have left the school site.

Staff Responsibilities

All staff must:

- Model appropriate device use.
- Enforce this procedure consistently.
- Challenge unauthorised phone use.
- Report safeguarding concerns arising from mobile device misuse.
- Follow GDPR and school data protection requirements when handling confiscated devices.

Staff should avoid personal mobile phone use in the presence of pupils except where operationally necessary

Parent and Carer Communication

The school will:

- Communicate the mobile phone policy at regular intervals
- Explain the rationale for restrictions on mobile phone use.
- Encourage parents/carers/social workers to contact the school admin rather than pupils directly during the school day.

In emergencies, communication between parents and pupils will be facilitated through the school admin.

Safeguarding Considerations

The school recognises that unrestricted mobile phone access can increase risks relating to:

- Cyberbullying.
- Online exploitation.
- Exposure to harmful content.
- Unauthorised photography and filming.
- Peer-on-peer abuse.
- Social media misuse.

Any misuse presenting a safeguarding concern will be referred immediately to the DSL and managed in accordance with Keeping Children Safe in Education (KCSIE) and the school's safeguarding procedures.

Reasonable Adjustments and Exceptions

Reasonable adjustments may be made where required under the Equality Act 2010.

Exceptions may include pupils who require access to a device because of:

- A medical condition.
- Disability-related support.
- Assistive technology requirements.
- Specific safeguarding arrangements.
- Exceptional circumstances authorised by the Headteacher (only).

Examples may include diabetes monitoring applications or medical alert systems.

All exceptions must be formally authorised and risk assessed where necessary.

Breaches of the Mobile Phone Procedure

Initial Response

Where a pupil is found to be in possession of, using or accessing a mobile phone or smart device at school:

- Staff will respond calmly and professionally.
- Pupils will be given a clear reminder of the school's expectations.
- Where appropriate, pupils will be encouraged to hand over the device voluntarily.

These are considered reasonable requests and supportive interventions

Failure to comply

Where a pattern of unauthorised phone use is identified, the school may implement:

- Parents/carers will be contacted and asked to attend to remove the phone/device
- Pupils may be returned home (if safe and appropriate) to comply with the policy – particularly in attempts to safeguard ALL at site.
- Parents/carers will support the school in its implementation of these safeguarding measures.

Serious Misuse

More serious incidents may include:

- Recording or photographing others without permission.
- Sharing images, videos or personal information.
- Cyberbullying or online harassment.
- Accessing inappropriate online content.

In these circumstances the school may:

- Confiscate the device in accordance with school procedures.
- Inform parents/carers.
- Refer the matter to the Designated Safeguarding Lead (DSL).

- Implement behaviour or safeguarding measures proportionate to the level of risk.
- Seek support from external agencies where appropriate.

Safeguarding Considerations

Any misuse involving online safety concerns, peer-on-peer abuse, exploitation, criminal behaviour, self-harm risk or threats to the safety of others will be managed under the school's Safeguarding and Child Protection Policy and may result in referral to external agencies, including the police where necessary. The school will act in line with Department for Education guidance on mobile phones in schools and safeguarding responsibilities

Storage and Liability

The school will take reasonable steps to safeguard confiscated or stored devices.

However:

- Pupils bring devices to school at their own risk.
- Parents remain responsible for ensuring appropriate insurance cover.
- The school accepts liability only where negligence can be demonstrated.

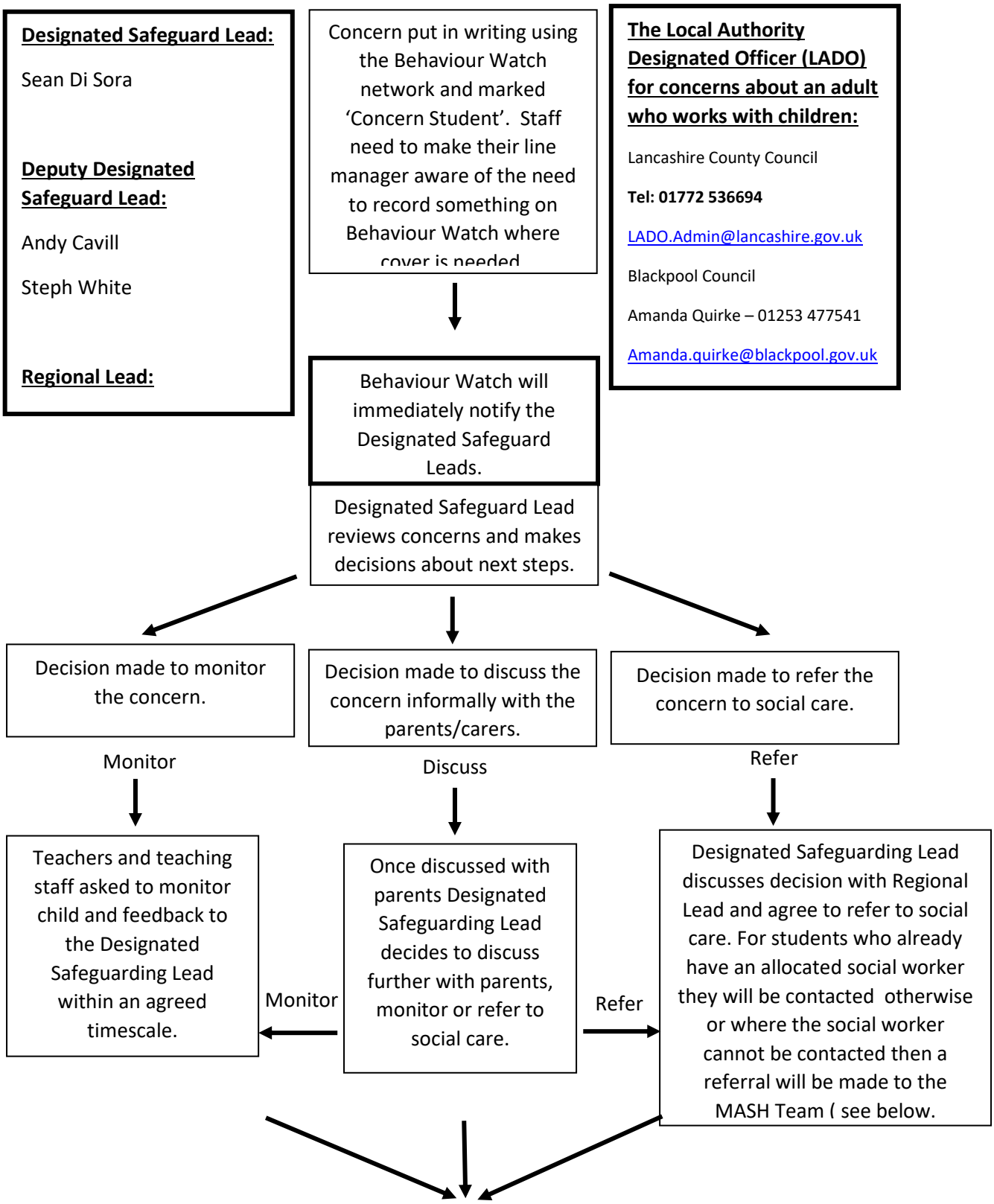
Monitoring and Review

The Headteacher and Proprietor/Governing Body will review:

- Behaviour incidents involving mobile phones.
- Safeguarding referrals involving technology misuse.
- Compliance with DfE statutory guidance.
- Feedback from staff, parents and pupils.

This procedure will be reviewed annually or following changes to legislation or DfE guidance.

Figure 1 - Process that should be followed should you think a child is suffering or likely to suffer harm, or in immediate danger.



In exceptional circumstances, anyone may report concerns directly to children's social care. However, staff should report this to the DSL/DDSL/Regional Lead ASAP. Staff can also use the NSPCC Whistleblowing Helpline for further advice/guidance.

Designated Safeguard Lead and/or Deputy Designated Safeguard Lead keep the log up to date with any new information. All safeguarding concerns are kept securely on Behaviour Watch and only the DSL/DDSL have access to these.

Multi-Agency Safeguarding Hub:

LCC – Multi-Agency Safeguarding Hub (MASH): 0300 123 6720

Annex A. Designated Safeguarding Lead (DSL) Operational Guide

Source: Guide to the Role of the DSL

Purpose

With exception of the Headteacher the Designated Safeguarding Lead (DSL) is the school's senior safeguarding professional and has lead responsibility for safeguarding and child protection, including online safety.

This annex provides an overview of the DSL's operational responsibilities.

What Staff Need to Know

The DSL is the first point of contact for safeguarding concerns and acts as the link between the school, local safeguarding partners and external agencies.

The DSL supports staff in identifying, managing and escalating safeguarding concerns and provides safeguarding advice when required.

A Deputy DSL may undertake safeguarding activity; however, overall lead responsibility remains with the DSL.

Key Responsibilities

The DSL is responsible for:

- Managing safeguarding, child protection and adult safeguarding concerns.
- Making referrals to Children's Social Care, Adult Safeguarding, Police, Prevent, DBS and LADO routes where appropriate.
- Supporting staff to identify risk and vulnerability.
- Maintaining safeguarding records and chronologies.
- Ensuring safeguarding information is transferred securely when learners move settings.
- Coordinating multi-agency working.
- Leading safeguarding training and updates.
- Monitoring safeguarding themes, trends and emerging risks.
- Providing safeguarding assurance to leaders and governance representatives.
- Maintaining oversight of online safety, filtering and monitoring arrangements.

Particular attention should be given to learners who:

- have a social worker;
- have previously had a social worker;
- are looked after or previously looked after;
- are care experienced;
- have SEND, ASN or ALN;
- are vulnerable to exploitation, abuse or neglect.

What Staff Should Do

- Report concerns promptly to the DSL or Deputy DSL.
- Seek advice if unsure whether something constitutes a safeguarding concern.
- Share information even where concerns appear low level.
- Never assume another person has reported a concern.

Annex B. Child-on-Child / Learner-on-Learner Abuse

Purpose

This annex provides additional guidance regarding abuse that occurs between learners.

What Staff Need to Know

Abuse between learners can occur inside or outside school or college and online.

Child-on-child / Learner-on-learner abuse should never be dismissed as:

- banter;
- part of growing up;
- horseplay;
- experimentation;
- relationship difficulties.

Abuse can be one-off or repeated and may cause significant harm.

Forms of Child-on-Child Abuse

This may include:

- Bullying and cyberbullying.
- Sexual harassment.
- Sexual violence.
- Harmful sexual behaviour.
- Abuse within intimate relationships.
- Physical abuse.
- Coercion and control.
- Initiation or hazing behaviours.
- Image-based abuse.
- Exploitation and online abuse.

Key Considerations

The DSL should consider:

- Victim safety.
- Ongoing risk.
- The wishes and feelings of the victim.
- Power imbalance.
- Age and developmental stage.
- SEND and communication needs.
- Wider contextual safeguarding concerns.

Risk assessments and safety plans may be required.

What Staff Should Do

- Take all concerns seriously.
- Prioritise learner safety.
- Record concerns accurately.
- Report concerns immediately.
- Avoid investigating.
- Maintain confidentiality and share information on a need-to-know basis.

Further Reading

- Anti-Bullying Policy
- Positive Behaviour Support Policy

Annex C. Online Safety, Filtering and Monitoring

Purpose

Online safety forms part of the school, wider safeguarding responsibilities.

This annex provides guidance on safeguarding risks associated with digital technology and online activity.

What Staff Need to Know

Online harm may include:

- Grooming.
- Exploitation.
- Cyberbullying.
- Image-based abuse.
- Radicalisation.
- AI-generated abuse.
- Online coercion.
- Exposure to harmful content.
- Encouragement of self-harm or suicide.

Online abuse should be treated with the same level of seriousness as abuse occurring offline.

Filtering and Monitoring

Filtering systems help prevent access to harmful or inappropriate content.

Monitoring systems help identify concerning activity that may indicate safeguarding concerns.

No system can remove all risk and professional vigilance remains essential.

Leadership Responsibilities

Leaders should understand:

- What filtering systems are in place.
- What monitoring systems are in place.
- How alerts are managed.
- Who reviews concerns.
- System limitations.
- How effectiveness is reviewed and assured.

What Staff Should Do

- Take online concerns seriously.
- Preserve evidence where appropriate.
- Avoid deleting content linked to safeguarding concerns.
- Report concerns immediately.
- Avoid conducting independent investigations.
- Seek immediate support where serious harm may have occurred.

Further Reading

- Acceptable Use Policy
- Professional Boundaries and Conduct Policy
- Online Safety Policy

Annex D. Contextual Safeguarding Risks

Purpose

Contextual safeguarding recognises that harm can occur outside the family home and may arise through peer groups, communities, transport networks, online environments and wider social contexts.

What Staff Need to Know

This annex applies to:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Serious Violence
- Modern Slavery
- Human Trafficking
- Child Abduction
- Radicalisation
- Extremism
- Honour-Based Abuse
- Forced Marriage
- Female Genital Mutilation (FGM)
- Missing Episodes
- Online Exploitation

Concerns rarely occur in isolation and may overlap. The presence of one contextual safeguarding concern may indicate wider abuse, exploitation, neglect, trauma or vulnerability and should not be viewed in isolation.

Staff should remain professionally curious and consider the wider context surrounding concerns.

Key Considerations

Concerns may require:

- Multi-agency working.
- Early help / family help.
- Police involvement.
- Prevent or Channel consideration.
- Social care referral.
- Increased safeguarding monitoring.

Female Genital Mutilation (FGM)

FGM is illegal and a form of child abuse.

Staff have a mandatory duty to personally report known cases of FGM in under-18s directly to the police.

The DSL must also be informed immediately.

Radicalisation and Extremism

Concerns regarding radicalisation or extremism should be reported to the DSL, who will consider whether Prevent or Channel processes are appropriate.

What Staff Should Do

- Remain professionally curious.
- Consider cumulative risk.
- Report concerns promptly.
- Continue to share concerns where patterns emerge.
- Avoid investigating.
- Seek immediate assistance where there is risk of significant harm.

Further Reading

- Preventing Radicalisation and Extremism Policy
- Local safeguarding procedures

Annex E. Low-Level Concerns

Purpose

Promoting an open and transparent safeguarding culture requires concerns about staff conduct to be identified, reported and addressed at the earliest opportunity.

What Staff Need to Know

A low-level concern is any concern, however small, that an adult has acted in a way that is inconsistent with the Professional Boundaries and Conduct Policy but does not meet the harm threshold.

Examples

Examples may include:

- Over-familiar behaviour.
- Favouritism.
- Boundary-blurring behaviour.
- Inappropriate one-to-one situations.
- Unnecessary physical contact.
- Personal communication outside agreed processes.
- Inappropriate use of personal devices.

This list is not exhaustive.

Why Low-Level Concerns Matter

Low-level concerns can identify emerging patterns of behaviour that may indicate wider safeguarding risks.

What Staff Should Do

- Share concerns promptly with the Headteacher if not available (not DSL)
- Record concerns accurately.
- Seek advice if unsure.
- Never dismiss a concern because it appears minor.

Further Reading

- Staff Code of Conduct
- Professional Boundaries and Conduct Policy

Annex F. Safer Recruitment

Purpose

Safer recruitment helps prevent unsuitable individuals from gaining access to learners.

What Staff Need to Know

Safer recruitment applies to:

- Employees.
- Volunteers.
- Governors.
- Agency workers.
- Contractors.
- Supply staff.
- Students

Key Requirements

Recruitment should include:

- Identity checks.
- Right to work checks.
- DBS and barred list checks.
- Reference checks.
- Employment history verification.
- Examination of gaps in employment.
- Qualification checks.
- Overseas checks where required.
- Prohibition checks where required.
- Safeguarding-focused interview questions.
- Single Central Record assurance.

What Staff Should Do

- Escalate recruitment concerns promptly.
- Verify safeguarding requirements have been completed before individuals commence work.
- Seek HR and safeguarding advice where concerns arise.

Further Reading

- Recruitment and Selection Policy

Annex G. Absent and Missing Education

Purpose

Attendance is a safeguarding responsibility.

This annex outlines why attendance concerns should always be viewed through a safeguarding lens.

What Staff Need to Know

Attendance concerns can indicate:

- Abuse.
- Neglect.
- Exploitation.
- Mental health difficulties.
- Family crisis.
- Radicalisation.
- Online harm.

Particular attention should be given to learners who:

- have a social worker;
- have previously had a social worker;
- are looked after or previously looked after;
- are care experienced;
- have SEND, ASN or ALN;
- are subject to Child Protection or Child in Need plans.

Key Considerations

Attendance should be considered alongside:

- Safeguarding history.
- Behaviour.
- Wellbeing.
- Family circumstances.
- Exploitation risks.
- Contextual safeguarding concerns.

What Staff Should Do

- Report attendance concerns in line with procedures.
- Share safeguarding concerns with the DSL.
- Record actions and decisions.
- Escalate concerns where risks increase.

Further Reading - Attendance Policy

Annex H. Adult Safeguarding (Learners Aged 18+)

Purpose

This annex provides additional guidance on safeguarding learners aged 18 and over.

Whilst child protection procedures apply to learners under 18, adult safeguarding arrangements apply to learners aged 18 and above who have care and support needs and may be unable to protect themselves from abuse, neglect or exploitation.

This annex should be read alongside local safeguarding procedures.

What Staff Need to Know

Safeguarding responsibilities do not end when a learner turns 18.

Adult learners may continue to experience abuse, neglect, exploitation or harm and may require support and protection through adult safeguarding procedures.

Staff should remain alert to safeguarding concerns affecting adult learners and should report concerns in the same way they would for any other safeguarding issue.

Potential indicators of abuse, neglect and exploitation are outlined within Section 9 of the main policy.

Definition of an Adult at Risk

For safeguarding purposes, an adult may be considered at risk where they:

- Have needs for care and support; and
- Are experiencing, or are at risk of, abuse or neglect; and
- Are unable to protect themselves because of those care and support needs.

Not all adult learners will meet this definition. However, all safeguarding concerns should be taken seriously and discussed with the Designated Safeguarding Lead (DSL).

Types of Abuse

Adult safeguarding concerns may relate to:

- Physical abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Domestic abuse
- Neglect and acts of omission
- Self-neglect
- Discriminatory abuse
- Organisational abuse

- Modern slavery and exploitation
- Online abuse and exploitation

Abuse may occur in a single incident or develop over time through a pattern of harmful behaviour.

Key Differences Between Child Protection and Adult Safeguarding

For learners under 18:

- Child protection procedures apply.
- The welfare of the child is paramount.
- Children's safeguarding legislation and procedures are followed.

For learners aged 18 and over:

- Adult safeguarding procedures apply.
- Consent should normally be sought where appropriate.
- Mental capacity should be considered.
- The individual's wishes, views and desired outcomes should inform decision-making wherever possible.

Where there is an immediate risk of harm, serious crime, coercion, exploitation or significant public interest concern, action may be required without consent in accordance with safeguarding duties and legal requirements.

Where there is an immediate risk of serious harm, abuse, neglect or criminal activity, safeguarding action must not be delayed while issues of consent or capacity are considered.

Principles of Adult Safeguarding

Adult safeguarding is underpinned by the six principles of the Care Act 2014:

Empowerment

Supporting individuals to make informed decisions and maintain control over their own lives wherever possible.

Prevention

Taking action before harm occurs.

Proportionality

Responding in a way that is appropriate to the level of risk presented.

Protection

Providing support and representation for those most at risk.

Partnership

Working collaboratively with relevant agencies and professionals.

Accountability

Ensuring safeguarding decisions are transparent, lawful and defensible.

Mental Capacity and Consent

Adult learners should be presumed to have capacity unless it is established otherwise.

When responding to safeguarding concerns, consideration should be given to:

- The learner's ability to understand relevant information.
- Their ability to retain and weigh information.
- Their ability to communicate decisions.
- Whether they are able to make informed choices about their safety and wellbeing.

A person should not be treated as lacking capacity simply because they make a decision others consider unwise.

Where a learner lacks capacity in relation to a particular decision, actions should be taken in their best interests and be the least restrictive option available.

Additional Vulnerabilities

Some adult learners may face increased safeguarding risks due to:

- Learning disabilities.
- Autism or other neurodevelopmental needs.
- Mental health difficulties.
- Communication needs.
- Physical disabilities.
- Care experience.
- Social isolation.
- Dependency on others for care and support.
- Previous experiences of abuse, trauma or exploitation.

Staff should remain mindful of these factors and avoid making assumptions about an individual's ability to disclose concerns or seek help.

Multi-Agency Working

Effective adult safeguarding relies upon partnership working.

The DSL may work with:

- Adult Safeguarding Teams.
- Health and Mental Health Services.
- Social Workers.
- Advocacy Services.
- Housing Providers.
- Police.
- Care Providers.
- Other relevant professionals.

Safeguarding concerns should be managed collaboratively where appropriate to achieve the best possible outcomes for the learner.

What Staff Should Do

Where concerns relating to an adult learner arise, staff should:

- Consider immediate safety.
- Listen and respond appropriately.
- Record concerns factually and promptly.
- Report concerns to the DSL or Deputy DSL without delay.
- Seek immediate assistance where there is a risk of significant harm.
- Avoid investigating concerns themselves.

Staff do not need proof that abuse, neglect or exploitation has occurred before reporting concerns.

Key Principle

Adult safeguarding is about protecting people from abuse and neglect whilst respecting their rights, independence, choice and dignity.

The focus should always be on achieving the safest and most appropriate outcome for the individual, while balancing protection with empowerment and autonomy.

Appendix I

Legislation, Guidance and Regulatory Frameworks Underpinning Safeguarding and Child Protection in England

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Working Together to Safeguard Children (Current Version: 2026)

- **Means:** Statutory multi-agency guidance setting out how organisations and practitioners work together to help, protect and promote the welfare of children. Applies to all education providers.
- **Requires:** Effective early help arrangements, information sharing, child-centred practice, multi-agency collaboration, safeguarding accountability and timely intervention where concerns arise.
- **Our stance:** We work collaboratively with safeguarding partners and place the welfare of the child at the centre of all safeguarding activity.
- **Implementation example:** The Designated Safeguarding Lead (DSL) maintains effective referral, escalation and partnership-working arrangements aligned with local safeguarding partnership procedures.
- **Official link:** https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Keeping Children Safe in Education (Current Version: 2026)

- **Means:** Statutory safeguarding guidance for schools and colleges in England, including independent schools and colleges educating learners under 18 years of age.
- **Requires:** Robust safeguarding arrangements, safer recruitment, a trained DSL, effective child protection procedures, staff training, online safety measures, management of allegations, safeguarding governance and maintenance of a Single Central Record.
- **Our stance:** We embed safeguarding responsibilities throughout leadership, governance, curriculum delivery and operational practice.
- **Implementation example:** All staff complete safeguarding induction, receive regular safeguarding updates and confirm that they have read and understood KCSIE requirements relevant to their role.
- **Official link:** https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Children Act 1989 and Children Act 2004

- **Means:** The principal legislation establishing the child protection framework and duties to safeguard and promote the welfare of children.
- **Requires:** Agencies to work together to protect children from harm and to promote their welfare through effective assessment, intervention and support.
- **Our stance:** The welfare of the child is paramount and underpins all safeguarding decisions and actions.
- **Implementation example:** Concerns regarding abuse, neglect, exploitation or harm are acted upon promptly and referred in accordance with local safeguarding procedures.

Official links:

- Children Act 1989: https://www.legislation.gov.uk/ukpga/1989/41
- Children Act 2004: https://www.legislation.gov.uk/ukpga/2004/31

Education Act 2002

- **Means:** Establishes duties on education providers to safeguard and promote the welfare of children.
- **Requires:** Schools and colleges to make appropriate arrangements to safeguard and promote learners' welfare.
- **Our stance:** Safeguarding is a core leadership and governance responsibility.
- **Implementation example:** Governors, Trustees and Proprietors receive regular safeguarding compliance and assurance reports.

Official link:
https://www.legislation.gov.uk/ukpga/2002/32

The Education (Independent School Standards) Regulations 2014

- **Means:** The statutory standards that all independent schools are required to meet, including safeguarding, welfare, health and safety requirements.
- **Requires:** Effective safeguarding arrangements, safer recruitment procedures, appropriate risk management and leadership oversight.
- **Our stance:** We maintain safeguarding systems that meet Independent School Standards and are routinely quality assured.
- **Implementation example:** Safeguarding compliance is monitored through internal audits and reported to Managing Directors and the Board.
- **Official link:** https://www.legislation.gov.uk/uksi/2014/3283

Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012

- **Means:** Establish the legal framework for regulated activity, barring decisions and Disclosure and Barring Service (DBS) checks.
- **Requires:** Appropriate vetting, barring and suitability checks for individuals working with children.
- **Our stance:** We are committed to safer recruitment and maintaining a safe culture.
- **Implementation example:** All required recruitment and suitability checks are completed, verified and recorded on the Single Central Record before individuals commence regulated activity.

Official links:

- Safeguarding Vulnerable Groups Act 2006: https://www.legislation.gov.uk/ukpga/2006/47
- Protection of Freedoms Act 2012: https://www.legislation.gov.uk/ukpga/2012/9

Counter-Terrorism and Security Act 2015 (Prevent Duty)

- **Means:** Places a duty on schools and colleges to have due regard to the need to prevent people from being drawn into terrorism.
- **Requires:** Risk assessment, staff training, safeguarding procedures and referral pathways relating to radicalisation and extremism.
- **Our stance:** We recognise radicalisation as a safeguarding issue and promote a safe, respectful and inclusive learning environment.
- **Implementation example:** Staff receive Prevent training and concerns are assessed and managed through safeguarding processes, including referral where appropriate.

Official links:

- Counter-Terrorism and Security Act 2015: https://www.legislation.gov.uk/ukpga/2015/6
- Prevent Duty Guidance: https://www.gov.uk/government/publications/prevent-duty-guidance

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Equality Act 2010

- **Means:** Protects individuals from discrimination, harassment and victimisation and promotes equality of opportunity.
- **Requires:** Inclusive practice, reasonable adjustments and protection from unlawful discrimination.
- **Our stance:** Safeguarding practice is inclusive, equitable and responsive to individual needs, vulnerabilities and protected characteristics.
- **Implementation example:** Safeguarding risk assessments and support plans consider protected characteristics and barriers to participation or disclosure.

Official links:

- Equality Act 2010: https://www.legislation.gov.uk/ukpga/2010/15
- Equality Act 2010: Advice for Schools: https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools

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Additional Legislative Framework for Learners Aged 18 and Over

We recognise that some learners aged 18 and over may remain vulnerable due to disability, learning needs, care experience, mental health needs, trauma, exploitation, abuse or other factors. Safeguarding arrangements therefore extend beyond the age of 18 where appropriate.

Care Act 2014

- **Means:** The primary legislation governing adult safeguarding in England.
- **Requires:** Organisations to cooperate in protecting adults with care and support needs who may be experiencing, or at risk of, abuse or neglect.
- **Our stance:** We recognise that safeguarding responsibilities may continue beyond a learner's eighteenth birthday where vulnerabilities remain.
- **Implementation example:** Concerns relating to adults at risk are managed through safeguarding procedures and referred to relevant agencies where required.

Official links:

- Care Act 2014: https://www.legislation.gov.uk/ukpga/2014/23
- Care and Support Statutory Guidance: https://www.gov.uk/government/publications/care-act-statutory-guidance

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Mental Capacity Act 2005

- **Means:** Provides the legal framework for supporting decision-making where an individual may lack capacity to make a specific decision.
- **Requires:** Decisions to be made lawfully, proportionately and in the individual's best interests.
- **Our stance:** We balance safeguarding duties with respect for individual rights, wishes and autonomy.
- **Implementation example:** Capacity considerations are taken into account when safeguarding concerns involve vulnerable adult learners.

Official links:

- Mental Capacity Act 2005: https://www.legislation.gov.uk/ukpga/2005/9
- Mental Capacity Act Code of Practice: https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice