

Safeguarding and Child Protection Policy

Adopted Date:	01/09/2026
Review Date:	01/09/2027

Equality and Inclusion Statement

Apex Specialist Education and all learning centres are committed to equality, inclusion, belonging and respect. This statement applies to every school policy and guides our work across all learning centres.

We promote equality of opportunity, value diversity and work to eliminate discrimination, harassment and victimisation. In accordance with the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, we provide an inclusive education that enables all pupils to participate fully, overcome barriers, develop their potential and achieve positive outcomes.

We recognise diversity as a strength to be respected, celebrated and reflected throughout school life. We strive to ensure everyone feels safe, valued, represented and that they belong. This commitment informs our governance, leadership, safeguarding, curriculum, provision and practice.

Our Commitment:

We are committed to:

- Eliminating discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

Putting our Commitment into Practice:

The Proprietor, Governing Board and Leadership Team will:

- Consider equality implications and the impact of decisions, policies and practice on people with protected characteristics.
- Embed equality, accessibility and inclusion in the development and review of curriculum, provision and policies.
- Identify and seek to reduce or remove barriers to participation, learning, attendance, wellbeing and engagement.
- Promote belonging, positive relationships and high aspirations, particularly for pupils experiencing disadvantage or additional barriers.
- Respond to prejudice-based and discriminatory behaviour, including through safeguarding procedures where relevant.
- Monitor the implementation and impact of equality and inclusion across all learning centres.

Our commitment encompasses the protected characteristics identified in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

All members of our school community share responsibility for upholding equality, inclusion, belonging and respect in their conduct, relationships and implementation of school policies.

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1. Part One: Policy Statement and Procedures

1.1 Introduction

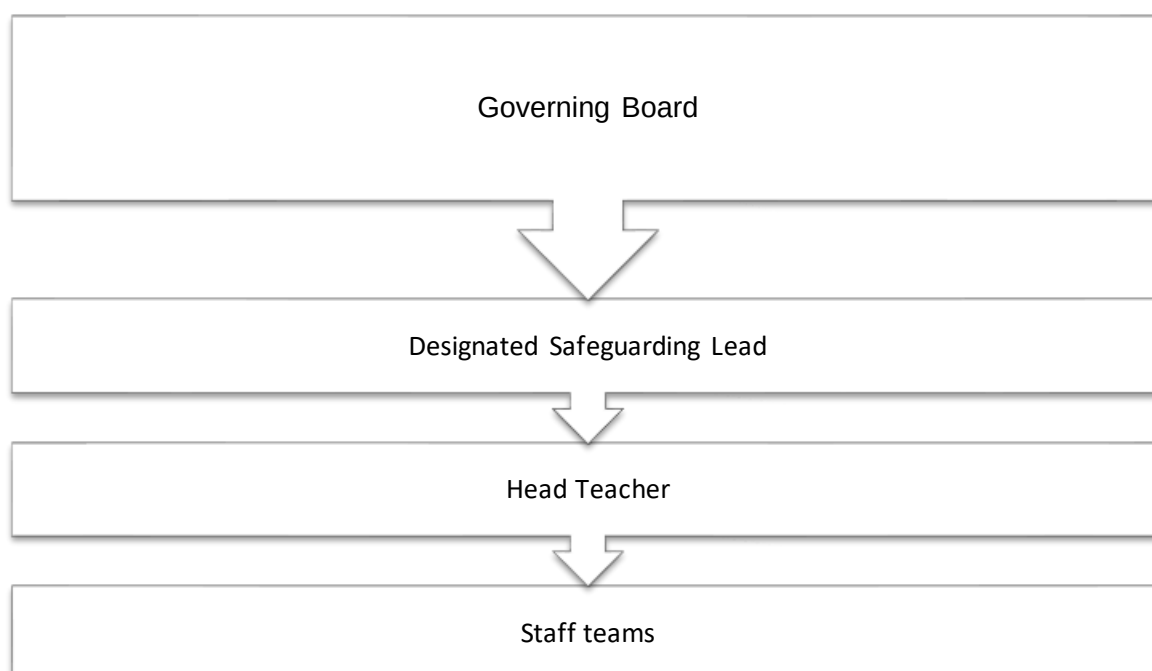
Healey Learning Centre is committed to safeguarding and promoting the welfare of all children and young people educated within the school, including those attending Healey Learning Centre (Rochdale) and its additional premises in Stockport and Altrincham. We are committed to providing a safe, nurturing and inclusive environment in which children and young people can develop educationally, socially and emotionally, free from fear, abuse and harm.

This safeguarding and child protection policy forms part of a comprehensive safeguarding framework operated by Apex Specialist Education, the proprietor of Healey Learning Centre. It sits alongside a suite of associated policies and procedures, including (but not limited to): child protection, staff code of conduct, safer recruitment, managing allegations against staff (including low-level concerns), complaints and representations, data protection and online safety. Together, these policies ensure a consistent and robust safeguarding approach across the school and all associated premises.

Safeguarding is everyone's responsibility. All staff working at Healey Learning Centre and its additional premises share a collective responsibility to safeguard and promote the welfare of children. There are, however, specific safeguarding roles that all staff must be aware of. The Designated Safeguarding Lead (DSL) holds overall responsibility for safeguarding and child protection across Healey Learning Centre, including its additional premises. The DSL is supported by Deputy Designated Safeguarding Leads (DDSLs) who provide operational safeguarding leadership at site level.

The Governing Board and Proprietor provide strategic oversight and challenge, ensuring that safeguarding and child protection policies and procedures are effective, compliant with statutory guidance, and consistently implemented across all sites. Through this governance structure, Healey Learning Centre ensures that safeguarding arrangements remain robust, well-resourced and fit for purpose as the school's provision expands.

Safeguarding Structure



At Healey Learning Centre, including its additional premises in Stockport and Altrincham, safeguarding permeates all aspects of school life and is everyone's responsibility. The school operates as part of a wider local and national safeguarding system, working in partnership with families, local authorities and other agencies to safeguard and promote the welfare of children.

In order to fulfil these responsibilities, a child-centred approach is adopted across all premises. This means that:

- Safeguarding systems and procedures are organised around the wishes, feelings and best interests of children and young people;
- Children are encouraged and supported to have a voice, are listened to, taken seriously, and are involved appropriately in decisions affecting their safety and wellbeing.

Healey Learning Centre aims to provide a positive, stimulating, caring and safe environment across all premises, which promotes the social, physical, emotional and moral development of every child. We work proactively to maintain a strong safeguarding culture in which children feel safe, are safe, and are supported both within the school environment and when travelling to and from school.

This safeguarding and child protection policy applies to all staff, volunteers, pupils and visitors across Healey Learning Centre and its additional premises. It should be

read and understood alongside the following associated policies and procedures:

- Allegations Management (including Low-Level Concerns) Policy
- Anti-Bullying Policy
- Designated Teacher Policy
- Online Safety Policy
- Safer Recruitment Policy
- Positive Behaviour Support Policy
- Whistleblowing Policy
- Staff Code of Conduct

1.2 Definitions

- Child(ren) means everyone under the age of 18. Statutory guidance Working Together to Safeguard Children (2026) defines safeguarding and promoting the welfare of children as:
- Providing help and support to meet the needs of children as soon as problems emerge.
 - Protecting children from maltreatment, whether that is within or outside the home, including online.
 - Preventing impairment of children's mental and physical health or development.
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - Taking action to enable all children to have the best outcomes.
- Child protection forms part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 outlines the different categories of abuse.
- Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development. Appendix 1 provides further detail.
- Making or sharing nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by children under the age of 18. Images include photographs, videos and livestreams and may be taken by the child, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or "deep nudes"
- Children refers to all individuals under the age of 18.

- The following three safeguarding partners are identified in Keeping Children Safe in Education and defined in the Children Act 2004, as amended by the Children and Social Work Act 2017. They work together to safeguard and promote the welfare of children, including identifying and responding to need:
 - The local authority.
 - Integrated Care Boards for an area within the local authority.
 - The chief officer of police for a police area within the local authority.
- Victim is a commonly used and recognised term. However, it is acknowledged that not all children who experience abuse consider themselves to be victims or wish to be described in this way. When managing incidents, terminology will be used sensitively and in a manner that the child feels most comfortable with.
- Alleged perpetrator(s) and perpetrator(s) are also commonly used and recognised terms. Care will be taken in the use of language, particularly in the presence of children, recognising that harmful behaviour can in some cases also be damaging to the child who displays it. Appropriate terminology will be determined on a case-by-case basis.

1.3 Named staff with specific responsibility for Child Protection

Healey Learning Centre, including its additional premises in Stockport and Altrincham, has a clearly defined safeguarding leadership structure to ensure effective oversight, availability and accountability across all sites.

The following staff hold specific responsibility for safeguarding and child protection:

- Callan Glean (Head of Inclusion, Behaviour, and Safeguarding / Designated Safeguarding Lead):
07454 959 807
- Matthew McCann (CEO / Deputy Designated Safeguarding Lead):
07915 269 720
- Robert Cochrane (Headteacher / Deputy Designated Safeguarding Lead):
07727 147 949
- Jade McCann (Head of Centre – Rochdale / Deputy Designated Safeguarding Lead):
07897 297 549
- Michelle Heverin (Alternative Provision Manager – Rochdale / Deputy Designated Safeguarding Lead):
07547 451 802
- Nadine Sawicki (Rochdale Pastoral Manager / Deputy Designated Safeguarding Lead):

07492 375522

- Joel Hulston (Stockport Head of Centre / Deputy Designated Safeguarding Lead):
07413 298 601
- Joanne Taylor (Stockport Pastoral Manager / Designated Safeguarding Lead):
07482 993 768
- Abbie Chadwick-Wood
(Head of Centre - Altrincham / Designated Safeguarding Lead):
07746 628 476
- Laura Scandrett
(Pastoral Assistant - Altrincham / Deputy Designated Safeguarding Lead):
07851 862 279

This structure ensures that a Deputy Designated Safeguarding Lead is available at each premises during operating hours, with clear escalation to the Designated Safeguarding Lead where required. All safeguarding concerns are managed through a consistent reporting and recording system across sites.

1.3.1 Training for Designated Staff in the school

The Designated Safeguarding Lead and all Deputy Designated Safeguarding Leads undertake appropriate safeguarding training in line with statutory guidance. Safeguarding training for designated staff is refreshed at least every two years, with additional updates undertaken in response to changes in legislation, guidance or local safeguarding priorities.

Current training records for designated safeguarding staff are as follows:

- Daniel McCann (2025) MCS/Educare
- Matthew McCann (2025) High Speed Training L3/Educare
- Callan Glean (2026) High Speed Training L3
- Abbie Chadwick-Wood (2025) High Speed Training L3/Educare
- Robert Cochrane (2026) High Speed Training L3
- Michelle Heverin (2026) High Speed Training L3
- Jade McCann (2026) High Speed Training L3
- Nadine Sawicki (2026) High Speed Training L3
- Joel Hulston (2025) High Speed Training L3
- Laura Scandrett (2026) High Speed Training L3
- Joanne Taylor (2026) High Speed Training L3

Training records are monitored centrally to ensure continued compliance and appropriate safeguarding capacity across all premises.

1.4 Framework Underpinning this Policy:

This safeguarding and child protection policy and associated procedures have been written and will be implemented in line with statutory safeguarding and child protection guidance and local safeguarding partnership procedures.

Healey Learning Centre (Rochdale) follows the safeguarding and child protection procedures established by the Rochdale Safeguarding Children Partnership. Where safeguarding concerns arise at the additional premises in Stockport or Altrincham, the relevant Local Safeguarding Partnership procedures and thresholds for the area in which the concern occurs will be followed.

The policy is also written in accordance with the Children Acts 1989 and 2004, the Education Act 2002, the Safeguarding Vulnerable Groups Act 2006, the Education (Independent School Standards) (England) Regulations 2014, Data (Use and Access) Act 2025, and other relevant legislation and statutory guidance, as detailed in the references section.

A consistent internal safeguarding framework, reporting route and recording system is used across all premises to ensure clarity, continuity and effective oversight, while responding appropriately to local safeguarding contexts.

1.5 Safeguarding Roles and Responsibilities:

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors working at Healey Learning Centre, including its additional premises in Stockport and Altrincham, and is consistent with the procedures of the three safeguarding partners. The policy and associated procedures also apply to extended school provision and off-site activities.

School staff do not have an investigative role where child protection is concerned; this is the responsibility of children's social care and the police. However, Healey Learning Centre has a duty to provide a safe environment in which children can learn. All staff, including volunteers, have a responsibility to act to safeguard and promote the welfare of children.

Apex Specialist Education plays a crucial role in preventative education through a whole-school approach that prepares pupils for life in modern Britain and promotes a culture of zero tolerance towards sexism, misogyny, misandry, homophobia, biphobia, transphobia and sexual violence or harassment. This is underpinned by:

- The behaviour policy
- Pastoral support systems

- A planned and inclusive programme of relationships, sex and health education (RSHE), delivered regularly and addressing issues including:
 - healthy and respectful relationships
 - boundaries and consent
 - stereotyping, prejudice and equality
 - body confidence and self-esteem
 - recognising abusive relationships, including coercive and controlling behaviour
 - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse and so-called honour-based violence, including forced marriage and FGM, and how to access support
 - what constitutes sexual harassment and sexual violence and why these behaviours are always unacceptable

All staff will:

- All staff will read and understand Part One of Keeping Children Safe in Education 2026 and review this guidance at least annually
- Sign a declaration at the beginning of each academic year confirming that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers, including explaining expectations around children's online activity
- Provide a safe and supportive environment for pupils who are LGBTQ+ to share concerns

All staff will be aware of:

- The systems that support safeguarding across Healey Learning Centre and its additional premises, including this safeguarding and child protection policy, the staff code of conduct, the identity and role of the DSL and DDSLs, the behaviour policy, the online safety policy and procedures for children missing from education
- The early help assessment process and their role within it, including identifying emerging concerns, liaising with the DSL and sharing information appropriately
- The process for making referrals to children's social care and the statutory assessments that may follow
- What to do if they identify a safeguarding concern or a child discloses abuse or neglect, including specific safeguarding issues such as FGM, and how to maintain appropriate confidentiality

- The signs and indicators of abuse, neglect and exploitation, including domestic abuse, child-on-child abuse, child sexual exploitation, child criminal exploitation, grooming, radicalisation and serious violence, including county lines
- New and emerging safeguarding threats, particularly online harm and the role of technology and social media
- The importance of reassuring children that they are being taken seriously and will be supported and kept safe
- That children may be at risk of harm inside and outside the home, at school and online
- That children who are, or who are perceived to be, LGBTQ+ may be particularly vulnerable to abuse
- That children and families may experience multiple needs at the same time
- What to look for to identify children who may need help or protection
- That children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, and that this may affect a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff must remain alert to its signs and impact and consider such concerns within safeguarding practice where appropriate.

Some people have specific and/or additional safeguarding responsibilities:

The Governing Board

The Governing Board and Proprietor take seriously their responsibilities under section 11 of the Children Act 2004 and section 157 of the Education Act 2002. Governors monitor compliance with statutory safeguarding requirements and identify areas for improvement. At least annually, the Designated Safeguarding Lead prepares a safeguarding report for the Governing Board. Discussions agreed actions and follow-up are formally recorded and monitored.

The Head Teacher

- Ensure that safeguarding policies and procedures adopted by the Governing Board, particularly those relating to referrals of suspected abuse or neglect, are implemented consistently across Healey Learning Centre and its additional premises
- Act as a strategic link between the Governing Board, senior leaders, the DSL and staff on safeguarding matters
- Act as case manager and liaise with the relevant local authority designated officer (LADO) where allegations are made against staff or volunteers
- Manage concerns that do not meet the threshold for an allegation in line with

the Low-Level Concerns Policy and the Staff Code of Conduct

- Ensure that a suitably trained DSL is appointed, and that appropriate deputy cover is always in place
- Ensure that the DSL and DDSLs access appropriate and up-to-date training
- Ensure that sufficient time and resources are allocated to fulfil safeguarding responsibilities effectively
- Refer cases to the Disclosure and Barring Service where required by law
- Promote an open, transparent culture in which staff feel confident to raise safeguarding concerns

Designated Safeguarding Lead (DSL) and Deputy DSL(s)

The DSL and DDSLs undertake safeguarding training and refresher training in line with statutory requirements. This includes refresher training at least every two years and regular updates through reading, briefings or attendance at safeguarding forums.

The role of the Designated Safeguarding Lead is set out in Keeping Children Safe in Education 2026, Part Two and Annex B.

The DSL and DDSLs will:

- Refer cases of suspected abuse to children's social care as require
- Support staff who make safeguarding referrals
- Refer concerns to the Channel programme where there is a risk of radicalisation
- Refer matters to the police where a crime may have been committed
- Liaise with the Head Teacher regarding safeguarding concerns, including section 47 enquiries and police investigations, and ensure appropriate arrangements are made for an Appropriate Adult where required
- Liaise with staff and external professionals to ensure children's needs are considered holistically
- Liaise with clinical professionals and mental health services where safeguarding concerns relate to mental health
- Act as a source of advice, support and expertise for all staff
- Liaise with the case manager and LADO in relation to safeguarding concerns involving staff
- Promote constructive engagement with parents and carers, including

where families are facing challenging circumstances

- Work with senior leaders to understand how safeguarding and welfare issues impact attendance, engagement and achievement, including for children who have or have had a social worker
- Ensure appropriate representation at multi-agency safeguarding meetings and provide written reports in line with safeguarding partnership procedures
- Ensure effective safeguarding record keeping and timely transfer of information when children join, move between premises or leave the school
- Share safeguarding information appropriately with receiving schools or colleges to support transition
- Maintain up-to-date knowledge of online safety risks, including the additional vulnerabilities faced by children with SEND
- Promote a culture of listening to children and taking their wishes and feelings into account
- Act as a point of contact with local safeguarding partnerships

Meetings the DSL/DDSL would attend.

- Initial Child Protection Conferences
- Review Child Protection Conferences
- Core Group meetings
- Strategy meetings
- Planning meetings
- Care planning meetings
- Child in Need meetings
- Complex abuse meetings

Attendance at meetings and outcomes will be recorded on CPOMS within two working days. Written records will be completed using an agreed meeting pro forma and uploaded securely.

1.5A Multi-Site Safeguarding Governance and Oversight

Healey Learning Centre operates as a registered school in Rochdale, with additional (DfE approved) premises in Stockport and Altrincham. This safeguarding and child protection policy applies consistently across the school and all associated premises.

Safeguarding governance is structured to ensure clear accountability, consistent practice and effective oversight across all sites, while allowing for site-specific responses to local safeguarding risks.

The Proprietor and Governing Board hold overarching responsibility for safeguarding and child protection across Healey Learning Centre and its additional premises, in line with statutory duties under the Children Act 2004, the Education Act 2002 and Keeping Children Safe in Education.

The Governing Board ensures that safeguarding arrangements are effective, compliant and consistently applied; that policies are reviewed annually; that leaders are held to account through challenge and assurance; and that safeguarding is embedded as a lived culture rather than solely a set of procedures.

A named safeguarding governor or proprietor representative provides strategic oversight and meets regularly with senior leaders and the DSL.

A central safeguarding leadership model operates across all premises, led by the DSL and supported by DDSLs based at each site. This ensures that safeguarding concerns are responded to promptly, escalation routes are clear, and safeguarding expertise and learning are shared across the organisation.

While policies and procedures are applied consistently, each premises maintains a site-specific safeguarding risk assessment and follows the procedures and thresholds of the local safeguarding partnership for the area in which it operates.

Safeguarding effectiveness is monitored through audits aligned to statutory guidance, termly DSL reports to the Governing Board, analysis of safeguarding data via CPOMS, scrutiny of training and capacity, and learning reviews following incidents or concerns.

A central safeguarding recording system (CPOMS) is used across all premises to support consistent record keeping, secure information sharing, effective oversight of safeguarding themes and the timely transfer of safeguarding information between premises and onward destinations.

Designated Safeguarding Leadership Across Sites

Apex Specialist Education operates a central safeguarding leadership model in support of Healey Learning Centre, led by a Designated Safeguarding Lead and supported by Deputy Designated Safeguarding Leads deployed across all premises.

This ensures that:

- A Designated Safeguarding Lead or Deputy Designated Safeguarding Lead is available and accessible during operating hours at each premises
- Safeguarding concerns are responded to promptly, proportionately and

consistently

- Clear escalation routes exist where concerns require senior leadership or multi-agency intervention
- Safeguarding expertise, learning and best practice are shared across all premises

All staff, pupils and parents are made aware of who the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are at their site and how safeguarding concerns can be raised.

Site-Specific Safeguarding Arrangements

While safeguarding policies and procedures are applied consistently across Healey Learning Centre and its additional premises, leaders recognise that each site operates within a distinct local safeguarding context.

Accordingly:

Healey Learning Centre, Higher Hillgate – Alternative Provision, and Altrincham Learning Centre maintain site-specific safeguarding risk assessments

- Healey Learning Centre (Rochdale), Stockport Learning Centre and Altrincham Learning Centre maintain site-specific safeguarding risk assessments
- Local safeguarding partnership procedures and thresholds are followed based on the geographic location of the premises where a concern arises
- Contextual safeguarding risks, including extra-familial harm, exploitation, child-on-child abuse and online safety, are reviewed regularly

Quality Assurance, Monitoring and Challenge

Safeguarding effectiveness across all Apex Specialist Education provisions is monitored through a planned safeguarding assurance cycle, including:

- Safeguarding audits aligned to Keeping Children Safe in Education
- Termly safeguarding reports to the Governing Board
- Monitoring of safeguarding data and emerging themes via CPOMS
- Scrutiny of staff induction, training and safeguarding leadership capacity
- Learning reviews following safeguarding incidents or concerns

Findings inform training, policy development and continuous improvement.

Information Sharing and Record Keeping Across Sites

Apex Specialist Education uses a centralised safeguarding recording system (CPOMS) across all provisions, ensuring:

- Consistent safeguarding record-keeping

- Secure and timely information sharing
- Effective oversight of safeguarding patterns and emerging risks
- Robust transfer of safeguarding files between provisions and onward destinations

Safeguarding Culture

Leaders promote a strong and consistent safeguarding culture across Healey Learning Centre and its additional premises, where safeguarding is understood as everyone's responsibility and children are listened to, supported and protected.

1.6 Sources of Support

Name	Designation	Contact Details
Callan Glean	DSL: Healey Learning Centre	07454 959 807
Matthew McCann	Deputy DSL	07915 269 720
Robert Cochrane	Deputy DSL	07727 147 949
Michelle Heverin	Deputy DSL	07547 451 802
Jade McCann	Deputy DSL Rochdale	07897 297 549
Joel Hulston	Deputy DSL Stockport	07413 298 601
Nadine Sawicki	DSL Rochdale	07492 375522
Joanne Taylor	DSL Stockport	07482 993 768
Abbie Chadwick-Wood	DSL Altrincham	07746 628 476
Laura Scandrett	Deputy DSL Altrincham	07851 862 279

Allegations against staff will be referred to the Local Authority Designated Officer (LADO) for the local authority in which the alleged incident occurred, or where the member of staff is primarily based, or where the child is ordinarily resident, in line with local safeguarding partnership guidance. The Designated Safeguarding Lead or Head Teacher will make contact with the appropriate LADO without delay. Up-to-date LADO and Children's Social Care contact details for each premises are maintained and readily accessible to safeguarding leaders.

1.7 DSL Availability

During term time and during school operating hours, a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will be available in person at each premises for staff to discuss safeguarding concerns.

Where exceptional circumstances mean that in-person availability is not possible, the DSL or DDSL will be available via telephone and, where appropriate, an agreed virtual meeting platform. Clear escalation arrangements are in place to ensure that

safeguarding advice and decision-making are accessible without delay.

For any out-of-hours or out-of-term-time activities, including educational visits or extended provision, the Designated Safeguarding Lead will ensure that adequate and appropriate safeguarding cover arrangements are in place and communicated clearly to staff in advance.

The school maintains robust cover and communication arrangements to ensure safeguarding information can be accessed and acted upon appropriately when the DSL is unavailable, including secure and confidential safeguarding communication arrangements

1.8 Transferring of Child Protection Files:

Where a child leaves Healey Learning Centre, including transfers between premises or to another school, college or education setting, the Designated Safeguarding Lead will ensure that the child protection file is transferred securely and promptly to the receiving Designated Safeguarding Lead.

Child protection files will be transferred as soon as possible and within five working days for an in-year transfer, or within the first five working days of the start of a new term. Prior to transfer, the Designated Safeguarding Lead will confirm that the child is on roll at the receiving school or setting.

A file transfer summary will be completed, and safeguarding records will be transferred separately from the main pupil file. A receipt will be requested and retained. Where files are not hand-delivered, they will be sent using secure arrangements, clearly marked 'strictly confidential' and addressed to the Designated Safeguarding Lead by name.

In addition to transferring the safeguarding file, the Designated Safeguarding Lead will consider whether it is appropriate to share relevant information with the receiving school or setting in advance of the child leaving. This is to enable appropriate safeguarding and support arrangements to be put in place to help the child remain safe and to support a successful transition, particularly where a child has had a social worker or has experienced abuse or trauma.

Where children move between premises operated by Healey Learning Centre, safeguarding records remain accessible through the central safeguarding recording system, with appropriate access controls and a clear documented handover between safeguarding leads.

1.9 Children Potentially at Greater Risk of Harm

While all children should be safeguarded, Healey Learning Centre recognises that some groups of children may be at increased risk of harm and may require additional support.

We recognise that experiences of adversity and trauma can leave children vulnerable to further harm and can also create barriers to attendance, learning, behaviour and mental health. All staff are expected to identify and recognise indicators of abuse, neglect and exploitation and to be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, county lines or serious violence
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is experiencing mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Has certain health conditions and specific additional needs
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Has been repeatedly removed from the classroom
- Is on a part-time timetable
- Is in Alternative Provision

For children who have an allocated social worker, the Designated Safeguarding Lead will maintain appropriate contact with the social worker and ensure that relevant safeguarding information is shared. Where a child joins Healey Learning Centre from another setting, the DSL will liaise with the previous school's DSL to confirm whether a child protection file exists and to request its transfer in line with statutory timescales.

The DSL will also seek any additional information required to enable effective safeguarding, participation in multi-agency meetings and appropriate support for the child. Where safeguarding or child protection concerns indicate that a referral is required, the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will follow the procedures set out within this policy without delay.

2. Part Two: What to do if you are worried about a child

2.1 Overview

Children and families should receive the right help at the right time. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. In order to fulfil this responsibility effectively, all staff will ensure that their approach is child-centred, considering at all times what is in the best interests of the child.

Staff will follow the procedures of the relevant Local Safeguarding Partnership for the area in which a safeguarding concern arises, in line with statutory guidance.

At Healey Learning Centre, including its additional premises in Stockport and Altrincham, staff recognise that children may not feel ready, able or confident to disclose abuse, exploitation or neglect, and may not recognise their experiences as harmful. Children may feel embarrassed, frightened, threatened or unsure, particularly where vulnerabilities, disability, language barriers or sexual orientation are factors. This must not prevent staff from exercising professional curiosity and discussing concerns with the Designated Safeguarding Lead. All staff will work to build trusted relationships with children and young people that support open communication and early identification of concerns.

2.2 School Child Protection Procedures:

The Designated Safeguarding Lead will ensure that the safeguarding and child protection policy is publicly available and that parents and carers are aware that all cases of suspected abuse or neglect may be referred to Children's Social Care, and of the school's role within this process.

The Designated Safeguarding Lead will also ensure that staff understand and use the policy appropriately, and that it is reviewed and updated regularly in conjunction with the Governing Board.

2.3 What Should Staff or Volunteers Do If They Have Concerns About A Child or Young Person?

Any member of staff or volunteer who has a concern about a child must immediately discuss this with the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.

Staff working at Healey Learning Centre and its additional premises will record concerns on CPOMS as a safeguarding concern, ensuring that the information recorded is clear, factual and comprehensive. Supply staff will record concerns using the school's reporting form and share this with the DSL or DDSL. All safeguarding records must be completed before the end of the working day.

The Designated Safeguarding Lead for Healey Learning Centre is Callan Glean. The following staff are certified DSLs for each centre: Abbie Chadwick-Wood (Altrincham), Joanne Taylor (Stockport), and Nadine Sawicki (Rochdale). The Deputy Designated Safeguarding Leads are: Matthew McCann, Robert Cochrane, Jade McCann, Michelle Heverin, Joel Hulston, and Laura Scandrett.

These senior colleagues are responsible for taking appropriate action where the welfare or safety of children is concerned. Where staff are uncertain whether a concern meets the threshold for child protection, discussion with the DSL or DDSL will support appropriate decision-making.

Staff should never:

- Do nothing or assume that another agency or professional will act
- Attempt to resolve safeguarding concerns themselves

What should staff do?

The safeguarding process is that all concerns are verbally reported immediately to the DSL or DDSL and then recorded. Healey Learning Centre staff record concerns on CPOMS. Supply staff complete the internal notification form. Where injuries are observed, a body map will be completed. Where physical injuries are evident, the injuries section of the concern record will be used. Further guidance is provided in section 2.14.

2.4 What should the DSL consider right at the outset?

The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will consider:

- Whether the concern relates to risk, need, or both
- The priority, severity and immediacy of any identified risk
- Whether the child's needs can be met through:
 - internal pastoral or universal support;
 - community-based Early Help;
 - targeted early help through Family Help, including a Family Help assessment where appropriate; or
 - referral to statutory children's social care services.

2.5 Further DSL considerations:

The DSL or DDSL will also consider:

- What resources are available and any limitations
- The context in which the concern or behaviour occurred
- What information is available about the child, family and wider environment
- What information is missing and the potential significance of this
- Whether thresholds for statutory intervention are met
- Who needs to be informed and what information they need
- Where further advice or support can be accessed
- Where a referral is not made, what alternative action will be taken, such as time-limited monitoring, discussion with parents or professionals, or further recording

2.6 Feedback to Staff who report concerns

Due to confidentiality, it may not always be appropriate for the Designated Safeguarding Lead to provide detailed feedback to staff who report concerns. Information will be shared on a need-to-know basis only. Decisions about information sharing will always be made with the primary aim of safeguarding and promoting the child's welfare.

2.7 Consent and Information Sharing

Healey Learning Centre will share relevant information promptly and securely to safeguard children and promote their welfare. Staff must not assume that another person has shared the information.

The school will comply with the information-sharing duty under section 16LA of the Children Act 2004. Where its conditions apply, relevant information must be shared with the appropriate recipient where this may support their safeguarding or welfare functions. The statutory exception applies where disclosure would be more detrimental to the child than withholding it. Decisions and reasons must be recorded.

Staff will work openly with children and families where safe to do so. Consent is not a prerequisite for necessary, lawful safeguarding information sharing. Staff must not seek consent or give advance notice where this would increase risk or prejudice protective action.

Information shared must be relevant, necessary, proportionate, accurate and transmitted securely. The school will identify the appropriate lawful basis and any additional condition required for sensitive information. The DSL will seek data-protection advice where needed without delaying urgent action.

When responding to a subject access request, the school will apply the relevant serious-harm exemption where its legal conditions are met. This does not prevent lawful sharing with safeguarding agencies to protect a child.

2.8 Calling the Police:

There may be circumstances where the police need to be contacted in relation to a safeguarding concern, including where a child has suffered significant harm or where a criminal offence is suspected.

Where the school is considering contacting the police, staff must follow the internal advice protocol and use the When to Call the Police guidance to support decision-making.

When police attend the school, the DSL or senior staff will clarify the purpose of police involvement and the action to be taken. Where a child is spoken to or searched as a suspect, an Appropriate Adult will be present in line with statutory guidance. Where a child has an allocated social worker, the social worker will be requested to act as the Appropriate Adult where appropriate. Where this is not possible, a senior member of staff may act as the Appropriate Adult, with the exception of the Head Teacher unless waiting would cause unreasonable delay and the offence does not relate to the school.

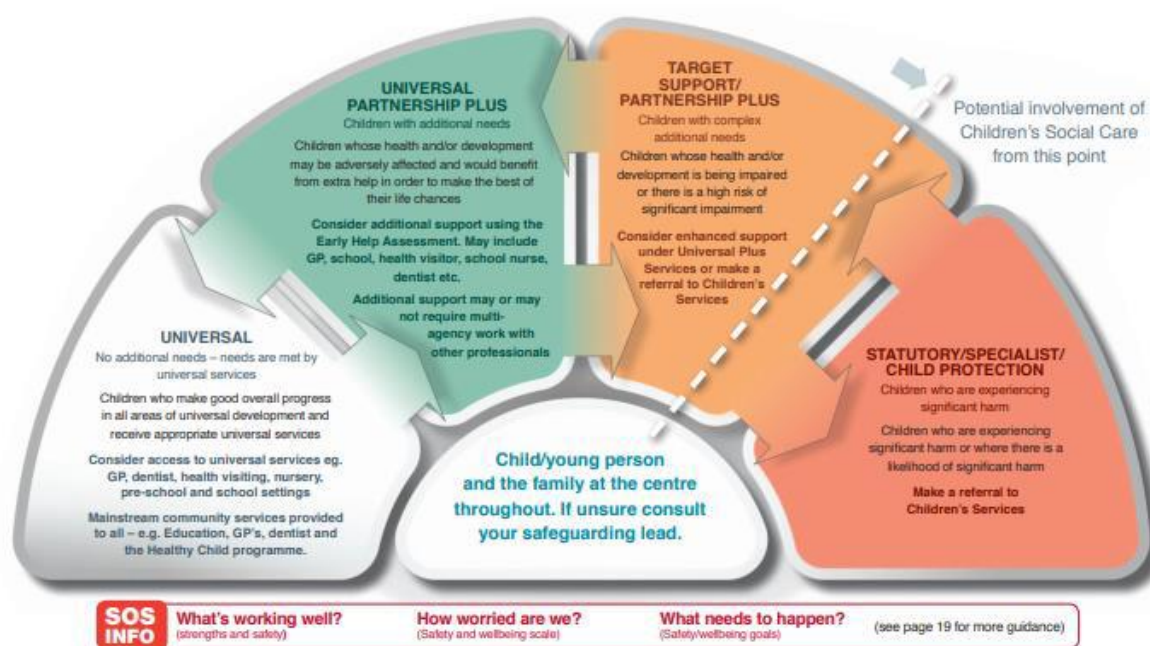
2.9 Consideration for Referrals to CSC and Thresholds Guidance:

The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will consider all safeguarding information received against the relevant Children's Social Care thresholds guidance.

Where a referral to Children's Social Care is required, the referral will clearly outline the nature of the concern, the impact on the child, and how the concern meets the applicable threshold for intervention. Decision-making and rationale will be recorded on the safeguarding recording system.

Thresholds guidance will be applied in line with the Local Safeguarding Partnership procedures for the local authority area in which the concern arises. Relevant thresholds guidance is accessible via the Children in Need Framework and Thresholds for Children's Social Care Intervention published on Procedures Online.

Where a referral does not meet statutory thresholds, the Designated Safeguarding Lead will consider alternative actions, including early help, internal pastoral support or continued monitoring, and will record the rationale for decisions made.



2.10 Referrals to Children's Social Care

Anyone can make a referral to Children's Social Care. In practice, referrals will usually be made by the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead, who will exercise professional judgement in relation to levels of need, risk and whether a child may be suffering, or likely to suffer, significant harm.

Referrals will be made in line with the procedures and thresholds of the Local Safeguarding Partnership for the local authority area in which the safeguarding concern arises.

Where a child has an allocated social worker, concerns that do not meet the threshold for a child protection referral will be discussed with the social worker as part of ongoing safeguarding and support planning.

2.11 Referrals under section 47 (s47)

Is this a child protection matter?

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where it has reasonable cause to suspect that a child who lives in, or is found in, their area is suffering or is likely to suffer significant harm.

The significant harm threshold justifies statutory intervention into family life. Where a section 47 referral is made, the referrer must provide clear information demonstrating that the child is suffering or is likely to suffer significant harm.

Where a child is at immediate risk of harm or has suffered significant harm, a referral to Children's Social Care and/or the police will be made immediately.

Contact details for Children's Social Care, including out-of-hours emergency duty teams, are maintained and readily accessible to safeguarding leaders for each premises.

Written referrals will be completed using the relevant local authority referral documentation and within required timescales following any telephone referral, in line with Local Safeguarding Partnership procedures.

2.12 Recording decision-making, rationales and contacts

The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will:

- make a clear record of how concerns were followed up and resolved
- record actions taken, decisions reached and outcomes
- document clear decision-making rationales for all safeguarding concerns and referrals

All safeguarding documentation, referrals and supporting information will be uploaded to the central safeguarding recording system (CPOMS).

All discussions with parents, carers and professionals in relation to safeguarding concerns will be recorded within the internal or external communication sections of CPOMS. Records will clearly show what information was shared, with whom (including full name, role and agency), when and why.

2.13 Children's Social Care responses to referrals and timescales

In response to a referral, Children's Social Care should make a decision within one working day regarding the course of action to be taken and should notify the referrer accordingly.

Possible responses may include:

make a clear record of how concerns were followed up and resolved

- providing advice or guidance
- signposting or referral to another service
- convening a strategy discussion or meeting
- undertaking section 47 enquiries
- convening an Initial Child Protection Conference
- taking no further action

Written referrals should be acknowledged by Children's Social Care within one working day. If an acknowledgement is not received within one working day, the Designated Safeguarding Lead will follow up with the relevant Children's Social Care team.

Where the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead disagrees with a decision or response, the Local Safeguarding Partnership Professional Resolution or Escalation Procedures will be followed.

2.14 Recording and Reporting Concerns in the school:

Any member of staff who has a concern about a child's welfare must speak to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead immediately.

Accurate, timely and detailed record-keeping is essential because it:

- supports early identification of safeguarding concerns
- enables patterns of concern to be recognised
- supports effective safeguarding oversight and quality assurance
- provides evidence of robust safeguarding practice for inspections and audits

All concerns must be recorded before the end of the working day.

Healey Learning Centre Staff

Staff must report safeguarding concerns immediately to the DSL or a deputy and record them on CPOMS as soon as possible, normally the same working day. Recording must never delay protective action.

Record direct observations, disclosures and information received from others. Identify the source and distinguish facts, reported information and professional opinion. Include actions, decisions and reasons. Staff must not investigate.

If the DSL or a deputy is unavailable, staff must take necessary protective action, including contacting children's social care or the police, and inform the DSL as soon as possible. Call 999 in an emergency.

The referrer must follow up if children's social care has not acknowledged the referral and communicated its next steps within one working day. Urgent concerns require earlier contact. Unresolved concerns must be escalated through local safeguarding procedures.

Supply Staff and Volunteers

- complete the internal notification to the DSL form
- include full personal and administrative detail
- record concerns in detail and in the child's own words
- complete a body map where injuries are observed
- submit completed forms directly to the DSL or Deputy DSL
- sign, date and time all records

Concerns must never be emailed. Hard copy records will be uploaded to CPOMS by safeguarding leaders.

Any of the following concerns must always be reported immediately to the DSL or DDSL (this list is not exhaustive):

- injuries, marks or bruising
- inconsistent or changing explanations
- significant changes in behaviour or presentation
- concerns about care received at home
- disclosures or allegations of abuse or neglect
- concerns involving adults or other children
- excessive or inappropriate one-to-one contact
- online safeguarding concerns, including the sharing of nudes or semi-nudes

2.15 Listening to children and managing 'disclosures'

All children must be listened to, taken seriously and responded to appropriately. There are no exceptions.

Staff should ensure that children feel safe to talk, know they are being heard and understand that their concerns will be acted upon. All adults working at Healey Learning Centre and its additional premises must be clear about how to respond calmly, respectfully and appropriately when a child discloses a worry or safeguarding concern.

Guidance on responding to disclosures is provided in the table below.

Listening	Recording
1. Do not make [false] promises to the child about confidentiality or keeping 'secrets' 2. You have no investigative role. Do not engage in 'interviewing' children or 'investigating' possible or suspected abuse. 3. Listen! Keep calm and don't interrupt. Remember to leave at least five seconds / space for children to think and respond 4. If you <i>have to clarify</i> information then ask only open questions wherever possible. This should be using the TED (Tell me, Explain, Describe) 5. Focus on, pick-out and record the facts i.e. who, what, when, where? Don't get embroiled in 'how' or 'why'? 6. Don't judge or react! Avoid displays of shock and keep opinions to yourself as these things may act as barriers to a child who has something sensitive to tell you. 7. 'When was the last time this happened' is an important thing to ascertain. 8. Reassure the child and make clear to them what you need to do now. 9. Reflect back – key points to enable the child to put right any misunderstandings 10. Ascertain the wishes and feelings of the child in any action to be taken 11. Name – the DSL/DDSL that you are going to report it to, it's important that the child knows who it is that you are passing the information on to	1. It is not advisable to try and complete a full record of the dialogue whilst trying to listen actively and attentively. However, it is a good idea to jot down any key phrases, dates, times etc. as soon as possible 2. Records that are handwritten should be succinct, legible, accurate, timed, signed and dated 3. Records should differentiate clearly between fact, opinion, interpretation etc. Ideally, stick to the facts as you understand them and leave it to the investigative agencies to test the hypotheses 4. If children or adults are being quoted then they must be quoted verbatim. In particular, avoid using other words or adult 'equivalents' for words that children use 5. It is important to record any questions or prompts asked i.e. to show that these were not 'leading' 6. The emotional context of the dialogue is important i.e. did the child become distressed at any point or, alternatively, did they speak matter-of-factly about quite distressing things 7. Any repetition is important to note i.e. things that the child repeats – these may be particularly significant. Similarly, gestures are important to describe accurately e.g. which hand / which cheek, open /closed

Following a disclosure or conversation, staff must report it verbally to the DSL **immediately**; they will then need to make a record of it. (Document your conversation as soon as possible and before the end of the working day, using the child's actual words. Keep your remarks factual and do not write down what you think the child means.

See *Appendix 3* for Action Flow chart

3. Part Three: Child Abuse and Neglect

3.1 Definitions and Indicators:

Working Together to Safeguard Children, defines abuse and neglect as a form of maltreatment of a child. A child may be abused or neglected through the infliction of harm or through a failure to act to prevent harm. Abuse may occur within a family, institutional or community setting and may be perpetrated by adults or by other children. Abuse may take place wholly online, or technology may be used to facilitate offline abuse.

Apex Specialist Education recognises that abuse, neglect and safeguarding concerns are rarely isolated issues. In many cases, multiple forms of harm overlap and interact.

At Healey Learning Centre and its additional premises, staff recognise that safeguarding concerns and behaviours may be linked to factors outside the school environment and may occur between children beyond the school setting. All staff, and particularly the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads, will consider whether children are at risk of abuse or exploitation outside their families. Extra-familial abuse can take a variety of forms.

All staff are aware that technology plays a significant role in many safeguarding and wellbeing concerns. Children may be at risk of abuse online as well as in their day-to-day lives, and in some cases abuse may occur both online and offline concurrently.

School staff are well placed to identify safeguarding concerns. Not all concerns are immediately obvious, and staff may notice indicators such as changes in emotional presentation, physical presentation, attendance or behaviour that may suggest a child is experiencing harm. Any significant change from a child's usual baseline will be discussed with the Designated Safeguarding Lead without delay.

Staff are also mindful of what serious case reviews have identified as the “toxic trio”, which refers to the interaction between:

- Parental substance misuse, including alcohol
- parental mental ill health
- domestic abuse

These factors, individually or collectively, can significantly impact parenting capacity and increase risk to children. Healey Learning Centre will closely monitor and support children where these factors are present and take appropriate action in line with thresholds guidance.

Further useful information can be found at:

- www.nspcc.org.uk/core-info
- <https://www.minded.org.uk/>
- Indicators of Abuse and Neglect: see *Appendix 4*
- Definitions of abuse and Neglect: see *Appendix 5*

3.2 Extra-Familial Harm

Healey Learning Centre recognises that safeguarding concerns may arise from circumstances outside the family and beyond the school environment. All staff, and particularly the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads, will consider whether children are at risk of abuse or exploitation in extra-familial contexts.

Extra-familial harm can take many forms and children may be vulnerable to multiple overlapping risks, including but not limited to sexual abuse, sexual harassment and exploitation, abusive teenage relationships, criminal exploitation, serious youth violence, county lines activity and radicalisation, physical, sexual and emotional abuse and stalking within teenage relationships, and financial exploitation.

Safeguarding responses will take account of contextual risk and will involve appropriate information sharing and multi-agency working where required.

4.0 Part Four: Children in Specific Circumstances

Keeping Children Safe in Education (2026), Part One and Annex A, outlines a range of safeguarding issues that may affect children. Local Safeguarding Partnership procedures refer to some of these as children in specific circumstances.

4.1 So called ‘Honour-based’ Abuse:

The terms honour-based abuse, honour crime or izzat refer to a range of crimes of violence, primarily but not exclusively against women and girls. These may include assault, imprisonment and murder, where an individual is punished by family or community members for allegedly undermining what is perceived to be the correct code of behaviour.

Honour-based abuse can be distinguished from other forms of abuse as it is often carried out with a degree of approval, collusion or pressure from extended family or community members. Victims may face multiple perpetrators, both within the UK and abroad.

Honour-based abuse can be linked to other harmful practices, including forced marriage and female genital mutilation. All concerns relating to honour-based abuse will be treated as safeguarding and child protection matters and responded to

immediately in line with statutory guidance and local safeguarding partnership procedures.



Boys as well as girls may be victims of honour-based abuse. Where there are concerns about actual or potential honour-based violence, staff will follow the One Chance Rule. This recognises that there may only be one opportunity to speak to a potential victim and, therefore, one opportunity to safeguard them.

Any concerns relating to honour-based abuse will be treated as child protection matters and managed in line with Local Safeguarding Partnership procedures. Immediate action will be taken where risk is identified.

4.2 Forced marriage:

A forced marriage is one in which one or both parties do not consent to the marriage and are coerced into it. Duress may include physical, psychological, sexual, emotional or financial pressure. In cases involving vulnerable adults who lack capacity, coercion is not required for a marriage to be considered forced.

In England and Wales, it is an offence to carry out conduct intended to cause a child to marry before their eighteenth birthday, even without violence, threats or other coercion. This includes unofficial or non-legally binding marriages. Staff must report concerns immediately through the school's safeguarding procedures.

Indicators of forced marriage may include, but are not limited to:

Emotional and psychological abuse, such as removal from education, restriction of freedom of movement, preventing access to English language learning, preventing private contact with professionals, threats of deportation, threats to remove children, control over immigration or visa status, use of spiritual or cultural pressure, or community shaming.

Physical abuse, including threats of violence, assault, abduction, false imprisonment, acid attacks or homicide. Abuse may involve multiple family members or members of the wider community.

Financial abuse, including controlling access to money, withholding earnings, or creating financial dependency to maintain control.

Sexual abuse, including rape, sexual assault, forced sexual activity, abduction or drugging to facilitate compliance. Forced marriage may involve offences such as kidnapping or administering substances.

Emotional abuse may also include enforced servitude, unpaid domestic or family labour, threats of self-harm by perpetrators, humiliation or isolation, and removal of children to exert control.

A distinguishing feature of honour-based abuse and forced marriage is the potential for collusion between family members, extended family and the wider community.

Confidentiality and disclosure

Risk can escalate very quickly in cases of honour-based abuse and forced marriage. The same standards of confidentiality apply as with all safeguarding matters; however, staff must exercise heightened caution.

Perpetrators may attempt to obtain information about a victim's whereabouts through a range of means, including misuse of professional networks or digital systems. Care must be taken when using interpreters or community representatives, and advice should be sought from safeguarding leads where there is uncertainty about safety.

Where there are concerns relating to forced marriage, Local Safeguarding Partnership procedures will be followed without delay.

Further information is available from

Forced Marriage Unit 020 7008 015

Email fmufcdo.gov.uk

[Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK \(www.gov.uk\)](#)

4.3 Female Genital Mutilation (FGM):

Female Genital Mutilation comprises all procedures involving partial or total removal or alteration of the external female genitalia for non-medical reasons. It is illegal in the United Kingdom and constitutes a form of child abuse with serious and long-lasting physical and psychological consequences.

FGM may be presented within families or communities as a cultural or beneficial practice, which can create barriers to disclosure. Girls at risk may be unaware of the practice or that it may be planned for them. This reinforces the importance of professional curiosity and vigilance.

UNICEF estimates that over 200 million women and girls worldwide have experienced FGM across multiple countries. While prevalence varies, safeguarding responses must be robust whenever risk is identified.

All concerns relating to FGM will be treated as child protection matters and managed in line with statutory guidance and Local Safeguarding Partnership procedures, including mandatory reporting duties where applicable.



Female Genital Mutilation has also been documented in countries including Iraq, Israel, Oman, the United Arab Emirates, the Occupied Palestinian Territories, India, Indonesia, Malaysia and Pakistan. It can occur within the United Kingdom.

FGM may be carried out on infants, children or adolescents, most commonly between the ages of 3 and 12, although it can also occur in older adolescents or adult women.

Indicators that a child may be at risk of Female Genital Mutilation include, but are not limited to:

Indicators include:

- Family origins are from a country where it is practiced.
- mother or a sister who has undergone FGM.
- mention of a 'party', 'celebration', 'becoming a woman';
- visiting older relatives visiting from the country of origin;
- plans for extended travel to a country of origin, particularly in the weeks leading up to the summer holidays
- talk about a 'special' procedure to become a woman

Further information is available through the multi-agency statutory guidance on Female Genital Mutilation, the FGM resource pack and Female Genital Mutilation: Guidance for Schools.

Where there are concerns relating to Female Genital Mutilation, staff will follow Local Safeguarding Partnership procedures without delay.

Mandatory reporting duty

Since 31 October 2015, there has been a mandatory duty on teachers to report to the police where, in the course of their professional duties, they discover that Female Genital Mutilation appears to have been carried out on a child under the age of 18. This duty applies where FGM is disclosed by the victim or where there is visual evidence.

Where possible, teachers will discuss this with the Designated Safeguarding Lead unless there is a specific reason not to do so, and Children's Social Care will be involved as appropriate. This duty is set out in the Serious Crime Act 2015 and section 5B of the Female Genital Mutilation Act 2003.

4.4 Religious beliefs and Linked Abuse:

Research indicates that belief in spirit possession or witchcraft exists across cultures, religions and communities worldwide and is not confined to any particular group. Such beliefs are not in themselves evidence of abuse.

However, in a small number of cases, children have been subjected to significant harm where these beliefs have been used to justify abuse. The nature of such abuse can be particularly severe and have a profound impact on the child.

There may be links between beliefs relating to spirit possession or witchcraft and exploitation, including domestic servitude or sexual exploitation. Fear may be used to control children and make them compliant.

Beliefs may include that a child is possessed by a spirit, demon or force that is controlling their behaviour or that a child has supernatural powers to cause harm. Terminology used may include references to witchcraft, black magic, the evil eye, djinns, voodoo, obeah, kindoki or similar beliefs.

Families and carers may hold genuine beliefs and may be fearful or distressed. In some cases, adults may gain gratification or power through abusive practices framed as exorcism or cleansing.

Vulnerability

Children may be targeted because they are perceived as 'different'. This may relate to behaviour, illness, disability, bedwetting, independence, trauma, or no identifiable reason at all. Attempts to 'cure' or 'exorcise' a child may involve physical violence, burning, starvation, isolation or emotional abuse, all of which constitute abuse.

Indicators

Indicators of abuse linked to belief in spirit possession, which may also be common features in other kinds of abuse, include:

- a child reporting accusations of being evil or possessed
- signs of physical abuse
- withdrawal, confusion, fear or isolation
- deterioration in personal care
- irregular attendance or removal from education
- decline in educational performance
- lack of parental concern or attachment;

Where there are concerns that a child may be at risk of abuse linked to religious or spiritual beliefs, Local Safeguarding Partnership procedures will be followed immediately.

4.5 Child Sexual Exploitation (CSE):

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the child needs or wants, or for the financial or status gain of the perpetrator or facilitator.

A child may be sexually exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact and can occur through the use of technology.

CSE can affect any child, regardless of age, gender, background or circumstance, including 16 and 17-year-olds who are legally able to consent to sexual activity. It may involve contact or non-contact abuse and may occur without the child's immediate awareness, such as through the sharing of images or videos. Healey Learning Centre recognises that:

- exploitation can be committed or facilitated by an organised network or gang;
- a child may identify as belonging to that network/group;
- exploitation may constitute modern slavery;
- children subjected to exploitation may themselves be criminalised for actions committed under coercion;
- a child cannot consent to exploitation, abuse or trafficking.

Through the curriculum and wider pastoral provision, pupils are supported to understand healthy relationships, consent, grooming and exploitation. Where appropriate, awareness of child sexual exploitation and grooming behaviours is explicitly addressed.

Any concerns relating to child sexual exploitation must be reported to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, who will follow Local Safeguarding Partnership procedures.

Where screening or risk assessment tools are recommended by local safeguarding partnerships, these will be used to support decision-making prior to referral.

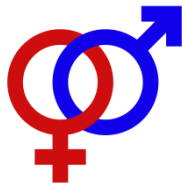
Staff recognise that children may not identify themselves as victims and may feel loyalty towards those exploiting them. Children may be exploited by adults or peers,

including through group or gang-related activity. Abuse may occur both online and offline.

Some children may be at increased vulnerability to CSE, including children who are looked after, previously looked after, have special educational needs or disabilities, or who experience instability, exclusion or unmet emotional needs.

No child can consent to their own exploitation. Where concerns are identified, safeguarding procedures will be followed without delay.

Potential indicators of CSE:



SEXUAL HEALTH & BEHAVIOUR

Sexually transmitted infections; pregnancy, terminations; inappropriate sexualised behaviour(s)



ABSENT FROM SCHOOL OR REPEATEDLY RUNNING AWAY

Truancy or regularly going missing / running away



FAMILIAL ABUSE AND / OR PROBLEMS AT HOME

Familial abuse or neglect; forced marriage or 'honour-based' violence; domestic abuse; substance / alcohol misuse; parental mental ill-health; homelessness / being in temporary accommodation; privately fostered / Looked After



EMOTIONAL AND PHYSICAL CONDITION

Suicidal ideation, self-harm; low self-esteem / confidence; confusion re sexual orientation; learning difficulties / disability; poor mental health; unexplained injuries or changes in appearance



GANGS, OLDER AGE GROUPS, INVOLVED IN CRIMINALITY

Direct involvement with gang members; involvement in criminal activity; involvement with older individuals or lacks same-age friends, contact with victims of CSE



USE OF TECHNOLOGY, SEXUAL BULLYING

Evidence of sharing nudes/semi-nudes', sexualised communication online; problematic use of internet / social networking; multiple phones, spending more time on phones, being secretive



ALCOHOL OR DRUG MISUSE

Problematic substance use, slurred speech, irritable, difficulty balancing, evidence of drug or alcohol use,



RECEIPT OF UNEXPLAINED GIFTS OR MONEY

Unexplained finances / gifts including mobile phone credit, clothes, jewellery, money



DISTRUST OF AUTHORITY FIGURES

Resistance to communicating with parents, teachers, social workers, foster carers, health professionals, Police et al

4.6 Serious Violence:

At Healey Learning Centre and its additional premises, all staff are aware of indicators that may signal a child is at risk from, or involved in, serious violence.

These may include:

- Increased absence from education
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These indicators may suggest involvement with, or exploitation by, individuals associated with criminal networks, gangs or serious violence.

Staff must immediately report concerns where a child:

- carries a weapon;
- uses a weapon; or
- expresses an intention to carry/use one.

The DSL should assess risk to both the individual pupil and others; consider wider information and concerns; put in place an appropriate safety and support plan; and, where relevant, take action to de-escalate peer conflict.

The Police, Crime, Sentencing and Courts Act 2022 clarifies that, for the purposes of the serious violence duty, violence is not limited to physical violence against the person and can include domestic abuse, sexual offences, violence against property and threats of violence. Terrorism is excluded from this definition and is addressed separately under Prevent.

Where there are concerns about serious violence, staff will report them to the DSL or DDSL immediately and the school will follow Local Safeguarding Partnership procedures.

4.7 Children affected by gangs and youth violence

Defining a gang is complex. Groups of young people may gather in public places to socialise and may be involved in low-level antisocial behaviour. This should not be automatically equated with the serious violence associated with gangs.

A street gang can be described as a durable, predominantly street-based group of young people who are seen by themselves and others as a distinct group and for whom crime and violence is integral to identity.

There is a distinction between street gangs and organised crime groups, particularly in levels of organisation, planning and control. However, there may be links between them, including where street gangs become involved in drug supply or exploitation on behalf of organised groups. Young people may be at risk of criminal exploitation, serious violence and sexual exploitation in these contexts.

Risks

A child may be at risk of harm as a victim, as someone involved in gang activity, or both. Vulnerability may be increased by factors such as instability at home, domestic abuse, trauma, poor educational engagement, unmet mental health needs, poverty, or the involvement of siblings or adults in criminality.

Children affected by gang activity or youth violence may be at risk of significant harm through physical, emotional and sexual abuse, exploitation and coercion.

Indicators may include:

- withdrawal from family or usual peer groups
- decline in attendance, engagement or attainment
- new slang, codes, hand signs or new associates

- unexplained money, possessions or multiple phones
- staying out unusually late or persistent rule-breaking
- significant changes in appearance or presentation
- dropping out of positive activities
- unexplained injuries or refusal to seek medical support
- going missing or being found out of area
- fear of entering certain areas or heightened anxiety
- talking about another individual who appears to exert significant control

Staff recognise that disclosure of gang involvement may be either a declaration of affiliation or a request for help. The more entrenched a child is, the less likely they are to disclose.

Where there are concerns relating to gang involvement or youth violence, the school will follow Local Safeguarding Partnership procedures and seek advice and support as required.

4.8 Criminal Exploitation (CCE) and County Lines:

Child criminal exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the child needs or wants, for the advantage of the perpetrator or facilitator, and/or through violence or threats of violence. A child may be criminally exploited even if the activity appears consensual. Exploitation can occur online and offline.

Criminal exploitation may include, but is not limited to, being coerced to transport drugs or money, shoplift, threaten others, store items, or facilitate criminal activity.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK using dedicated phone lines or other forms of contact. Children and vulnerable adults may be exploited to move, store or sell drugs and money, and coercion, intimidation, violence and weapons may be used.

Indicators may include:

- going missing from education or home, or being found out of area
- unexplained money, clothing, gifts or mobile phones
- frequent calls or messages, or secrecy around phones
- relationships with controlling or older individuals or groups

- unexplained absences or leaving home/care without explanation
- suspicion of assault or unexplained injuries
- parental or carer concerns
- carrying weapons
- decline in attendance, attainment or behaviour
- isolation from peers or sudden friendship changes
- self-harm or significant changes in emotional wellbeing

Where there are concerns about criminal exploitation or county lines, the school will follow Local Safeguarding Partnership procedures and consider referrals to Children's Social Care and the police as appropriate. Where recommended tools or guidance are published by local safeguarding partnerships, these will be used to support decision-making.

4.9 Modern slavery and human trafficking

Modern slavery is a form of exploitation where individuals, including children, are treated as commodities for criminal gain. The Modern Slavery Act 2015 includes offences relating to slavery, servitude and forced or compulsory labour and human trafficking.

Children may be exploited for sexual exploitation, criminal exploitation, domestic servitude or forced labour. Exploitation can occur within the UK and across borders. Children may be exploited by strangers, organised groups, or by family members.

Indicators may include:

- reluctance to seek help or provide personal details
- inconsistent accounts, scripted stories or fearfulness
- signs of dependency or control by others
- poor or overcrowded living conditions
- patterns of missing episodes or frequent moves
- limited freedom of movement or isolation
- limited English or lack of knowledge of their local area
- lack of identification documents
- signs of physical or psychological abuse or neglect
- work-related injuries, exhaustion or being frequently tired

- sexual health concerns, pregnancy or evidence of sexual exploitation

Where there are concerns relating to modern slavery or trafficking, the school will follow Local Safeguarding Partnership procedures and consider referrals to Children's Social Care and the National Referral Mechanism as appropriate.

4.10 Child-on-Child Abuse (including harassment and violence):

Healey Learning Centre recognises that children can abuse other children. Any incident of suspected or alleged child-on-child abuse will be taken seriously, responded to promptly and reported to the DSL or DDSL immediately.

Our belief(s) and expectations include:

- child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator;
- child-on-child abuse is preventable;
- staff should recognise indicators and intervene early;
- it may include serious physical assault or harm, or threats of harm involving a weapon;
- it may include racism, faith-targeted abuse and other discriminatory behaviour.

We recognise that a child who has harmed another may also be a victim and may have unmet needs. We will use language sensitively and in a way that supports children, including, where appropriate, the terms child who has been harmed and child who has harmed.

Child-on-child abuse may include (this list is not exhaustive):

- bullying, including online bullying and prejudice-based bullying
- physical abuse
- sexual violence and sexual harassment
- causing someone to engage in sexual activity without consent
- upskirting
- consensual and non-consensual sharing of nudes and semi-nudes
- initiation or hazing-type violence and rituals

We recognise that addressing inappropriate behaviour early, even where it appears low-level, can prevent escalation.

We also recognise that vulnerability can be heightened for children with SEND and other additional needs, and that abuse can manifest differently across genders and contexts, including where there are power imbalances or coercion.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator;

Prevention

We will minimise the risk of child-on-child abuse through:

- maintaining a safe, respectful and well-supervised environment
- linking safeguarding practice to behaviour, anti-bullying, RSHE/PSHE, online safety, staff code of conduct and low-level concerns procedures
- challenging unacceptable behaviour, language and attitudes
- ensuring clear behaviour expectations, rewards and sanctions
- using curriculum and targeted interventions to teach respectful relationships, boundaries and keeping safe messages
- ensuring staff and volunteers are trained to recognise indicators and respond appropriately
- ensuring pupils and parents know how to raise concerns and access support

Where concerns arise, the school will follow Local Safeguarding Partnership procedures and KCSIE Part Five.

4.11 Sexual Violence and Sexual Harassment between children in the school:

Healey Learning Centre recognises that sexual harassment, harmful sexual behaviour and sexual violence can occur between children of any age and sex, both online and face-to-face. Such behaviour is never acceptable and will not be tolerated. The school adopts a culture of “it could happen here” and recognises that the absence of reports does not mean that harmful behaviour is not occurring.

All reports and concerns will be taken seriously, handled sensitively and responded to promptly. Children who report sexual harassment, harmful sexual behaviour or sexual violence will be reassured that they are being taken seriously, will be supported and kept safe, and will never be made to feel ashamed, blamed or responsible for creating a problem.

Staff will challenge and respond to inappropriate or abusive behaviour and will never dismiss sexual comments, sexualised behaviour, harassment or abuse as “banter”, “part of growing up”, “just having a laugh” or similar. The school recognises that

downplaying such behaviour can contribute to a culture in which abuse becomes normalised and children may be less likely to report concerns.

The school recognises that sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through to inappropriate, problematic, abusive and violent behaviour. Harmful sexual behaviour may include sexual harassment and sexual violence and may occur as a single incident or as part of a wider pattern of behaviour.

When considering behaviour, staff and safeguarding leaders will take account of the child's age, developmental stage, level of understanding, SEND, communication needs, vulnerability, the nature and frequency of the behaviour, any power imbalance and the wider context in which the behaviour occurred.

The school will respond to harmful sexual behaviour in a way that safeguards the child who has been harmed, the child who has displayed the behaviour and any other children who may be at risk. The school recognises that a child who has harmed another child may also have experienced abuse, trauma, exploitation or other adversity and may themselves require safeguarding support.

Following every report of sexual violence, the DSL or a deputy will undertake an immediate risk and needs assessment. For sexual harassment, the need for an assessment will be considered individually.

Where rape, assault by penetration or sexual assault is reported, the starting point is referral to the police. Protective action and support must not wait for the outcome of an investigation.

Where relevant, the school's response may include:

- immediate safeguarding actions and support for the child who has been harmed;
- assessment of the needs, vulnerabilities and risks relating to the child who has displayed harmful behaviour;
- consideration of any wider or ongoing risk to other children;
- liaison with Children's Social Care and/or the police where thresholds are met;
- risk assessment and proportionate risk management planning;
- pastoral, therapeutic or clinical support where appropriate;
- targeted education, relationship and behaviour work;
- behaviour policy responses or sanctions where appropriate, alongside safeguarding action;
- appropriate supervision, timetable, staffing or environmental arrangements to reduce risk.

Legal Context

In line with the Sexual Offences Act 2003, sexual violence includes:

Rape: A person commits an offence of rape where they intentionally penetrate the vagina, anus or mouth of another person with their penis, the other person does not consent and there is no reasonable belief in consent.

Assault by penetration: A person commits an offence where they intentionally penetrate the vagina or anus of another person with a part of their body or anything else, the penetration is sexual, the other person does not consent and there is no reasonable belief in consent.

Sexual assault: A person commits an offence where they intentionally touch another person, the touching is sexual, the other person does not consent and there is no reasonable belief in consent.

Causing someone to engage in sexual activity without consent: This includes intentionally causing another person to engage in sexual activity where that person does not consent and there is no reasonable belief in consent. This may include forcing someone to strip, touch themselves sexually or engage in sexual activity with another person.

Consent means having the freedom and capacity to choose. Consent may be given for one type of activity but not another and can be withdrawn at any time.

- A child under the age of 13 can never provide valid consent to sexual activity.
- The age of consent is 16.
- Sexual activity without consent is a criminal offence.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature and may occur online or offline. It may be a standalone incident or form part of a broader pattern of harmful sexual behaviour.

Sexual harassment may violate a child's dignity, make them feel intimidated, degraded or humiliated, or create a hostile, offensive or sexualised environment.

It may include, but is not limited to:

Offline behaviour

- sexual comments, remarks or stories;
- sexualised comments about a person's body or appearance;
- sexualised name-calling;
- sexual jokes or taunting;

- deliberately brushing against another person;
- interfering with another person's clothing;
- displaying sexual images, photographs, drawings or other sexual content;
- unwanted physical contact of a sexual nature.

Online behaviour

Online sexual harassment may be standalone or form part of a broader pattern of abuse and may include:

- making or sharing nudes or semi-nudes, whether consensual or non-consensual;
- sharing unwanted sexual or explicit content;
- sexualised online bullying;
- unwanted sexual comments or messages;
- sexual coercion, pressure or threats;
- digitally manipulated or AI-generated sexual images, including deepfakes or "deep nudes";
- sexual exploitation facilitated through technology.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether consensual or non-consensual.

Upskirting

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks, whether covered by underwear or not, to obtain sexual gratification or to cause humiliation, distress or alarm.

Anyone of any gender can be a victim of upskirting.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a continuum from developmentally expected behaviour through to inappropriate, problematic, abusive and violent behaviour.

Harmful sexual behaviour is sexual behaviour that is developmentally inappropriate and may cause harm to the child displaying the behaviour, another child or both.

When considering whether behaviour may be harmful, the school will take account of:

- the ages and developmental stages of the children involved;
- any age or developmental gap;

- whether one child is pre-pubescent and another is not;
- SEND, communication needs or cognitive understanding;
- coercion, pressure, secrecy or fear;
- any power imbalance;
- repetition or escalation;
- whether the behaviour was planned;
- the impact on the child who experienced the behaviour;
- whether the behaviour is part of a wider pattern of abuse, exploitation or intimidation.

Staff should not attempt to determine harmful sexual behaviour solely by whether a child describes the behaviour as consensual.

Responding to Reports and Concerns

The school recognises that the initial response to a report or concern is critical. How adults respond can either encourage children to seek help or undermine their confidence in the safeguarding system.

Children may not disclose directly. Concerns may come to light through a friend, another child, a parent, an overheard conversation, changes in behaviour, online activity or other indicators.

Staff will:

- listen carefully and calmly;
- take the child seriously;
- avoid judgment or expressions of shock;
- not promise confidentiality;
- use open questions where clarification is necessary;
- avoid investigating or asking leading questions;
- explain clearly what will happen next;
- report concerns immediately to the DSL or DDSL;
- record concerns promptly on CPOMS in accordance with this policy.

All staff will follow the school's procedures for listening to children and managing disclosures.

Safeguarding Principles

The following principles will guide the school's response:

- the safety and best interests of the child who has been harmed will remain central;
- the wishes and feelings of the child who has been harmed will be listened to and considered;
- children should have as much control as is reasonably possible over how the matter is progressed, subject to the school's safeguarding duties;
- the needs of the child who has been harmed and the child who has displayed harmful behaviour will be considered separately;
- the school will recognise that both children may require safeguarding support;
- the school will consider any ongoing or wider risk to other children;
- responses will be proportionate to the nature, seriousness and context of the behaviour;
- action will seek to address immediate risk, underlying causes and support needs;
- safeguarding responses will avoid unnecessarily criminalising children while ensuring that criminal behaviour is referred appropriately;
- where required, the school will work with Children's Social Care, police, youth justice, education, health and other agencies.

DSL Considerations

In assessing and responding to a concern, the DSL or DDSL will consider:

- the wishes and feelings of the child who has been harmed;
- the child's age, developmental level and understanding;
- the views of parents or carers where appropriate and safe to seek them;
- the nature and seriousness of the behaviour;
- whether a criminal offence may have been committed;
- the ages and developmental stages of the children involved;
- SEND, communication needs and any additional vulnerabilities;
- any power imbalance;
- whether the incident occurred within an intimate relationship;
- whether there are intra-familial concerns or risks to siblings;
- whether the incident is a one-off or part of a wider pattern;
- whether there have been previous concerns or incidents;

- ongoing risks to the child who has been harmed;
- ongoing risks relating to the child who has displayed harmful behaviour;
- risks to other pupils or staff;
- online or technological factors;
- extra-familial and contextual safeguarding risks;
- whether the behaviour may indicate exploitation, coercion, grooming or abuse.

DSL Actions

Following assessment, the DSL or DDSL may:

- manage support internally where this is safe and proportionate;
- refer to Children's Social Care for the child who has been harmed and/or the child who has displayed harmful behaviour;
- refer to the police where appropriate, informed by the school's *When to Call the Police* guidance;
- seek targeted Family Help or community-based Early Help where statutory thresholds are not met;
- provide pastoral, therapeutic or clinical support;
- refer or signpost children and families to specialist external services;
- undertake or coordinate a harmful sexual behaviour risk assessment and risk management plan;
- convene an internal risk management meeting where appropriate;
- implement additional supervision, timetable, staffing, transport or space-management arrangements;
- provide targeted curriculum, relationship or behaviour interventions;
- apply behaviour policy sanctions where appropriate, alongside safeguarding action;
- regularly review risk, support and safeguarding arrangements.

Any risk assessment or risk management plan will be kept under review and updated when circumstances change.

Prevention

The school recognises that child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence are preventable.

Prevention is supported through:

- a strong safeguarding culture;
- clear behaviour expectations;
- relationships, sex and health education;
- teaching about consent, respectful relationships, boundaries and online safety;
- challenging sexism, misogyny, misandry, discrimination and sexualised language;
- early identification of concerning behaviour;
- trusted relationships between children and adults;
- timely pastoral, therapeutic and safeguarding intervention.

Toolkits and Resources

The school will use appropriate evidence-informed resources to support prevention, assessment and intervention, including resources suitable for children with SEND and those addressing problematic or harmful sexual behaviour both online and offline.

Further Sources of Support

The school will signpost children and families to appropriate specialist support services and national guidance where appropriate.

Where there are concerns relating to harmful sexual behaviour, sexual harassment or sexual violence, the school will follow Local Safeguarding Partnership procedures and Part Five of *Keeping Children Safe in Education 2026*.

4.12 Children requiring mental health support Inc. self-harm and suicidal ideation:

Healey Learning Centre recognises that we have an important role in supporting the mental health and wellbeing of our pupils across all premises. We have access to external mental health practitioners and work with a range of partner agencies to support children and families.

We recognise that mental health concerns can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff must therefore consider mental health concerns through a safeguarding lens and maintain professional curiosity.

Education settings are in a unique position to support prevention and early intervention by promoting resilience through an integrated whole-school approach tailored to

pupils' needs. A whole-school approach goes beyond teaching in the classroom and includes:

- culture, ethos and environment: promoting wellbeing through leadership practice, policies, values, attitudes and the social and physical environment
- teaching: using the curriculum and wider provision to develop knowledge, skills and strategies linked to health and wellbeing
- partnerships with families and the community: proactive engagement with parents and carers, external agencies and the wider community to promote consistent and coordinated support

Further information is available in the Department for Education guidance Mental health and behaviour in schools.

Where a mental health concern is also a safeguarding concern, staff must report it immediately to the DSL or DDSL and record it on the safeguarding recording system before the end of the working day.

Where a concern does not meet safeguarding thresholds but indicates a wellbeing need, staff should discuss this with the appropriate pastoral lead and/or the school's mental health practitioner so that support can be planned and delivered.

Mental health concerns may develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide. Only appropriately trained professionals should attempt to diagnose a mental health condition.

Self-Harm and Suicidal ideation

Any concern regarding self-harm or suicidal ideation must be treated seriously and considered in line with Local Safeguarding Partnership procedures. Some children may require support at child in need level (section 17) or higher, depending on risk and context.

School interventions should be evidenced as safe and effective and appropriate to the child's need and phase of education.

Self-harm means intentional self-poisoning or injury, regardless of its apparent purpose. Suicidal intent may be present, absent, uncertain or change over time. Staff must take every concern seriously and must not assume that a child is safe because they deny wanting to die.

Other harmful behaviour, including substance misuse or disordered eating, may also indicate a need for safeguarding or clinical support. Repetitive self-injurious behaviour associated with a child's individual needs must receive an appropriate response and must not be dismissed or automatically attributed to SEND.

If a child is suspected or found to be self-harming, strategies will be informed by any existing plan, risk assessment or agreed support strategy. Where no plan exists, the DSL/DDSL will coordinate an appropriate response, which may include:

- immediate safety measures and increased supervision where required
- reducing access to items that could be used to cause harm, where proportionate and lawful
- prompt contact with parents or carers, unless doing so would place the child at increased risk
- liaison with external professionals, including clinical services, where appropriate
- referral to children's social care where thresholds are met
- seeking urgent medical assistance or emergency services where there is an immediate threat to life or serious injury
- If staff believe a child is in danger, they should call 999 or arrange immediate attendance at A&E with a parent/carer or other suitable person. Where urgent mental-health support is required but it is not an emergency, NHS 111/111 mental-health support should be considered.

Where there is immediate danger, staff must obtain emergency assistance and maintain appropriate supervision while help is arranged. Existing plans must not delay urgent action. School safety planning must be informed by appropriate health professionals; it does not replace clinical assessment.

Where a child expresses suicidal intent, or where there are indicators of elevated risk, the DSL will work with the clinical services team and relevant professionals to undertake an appropriate risk assessment and safety plan, and will take urgent action where required.

Where there are concerns relating to self-harm or suicidal ideation, the school will follow Local Safeguarding Partnership procedures without delay.

4.13 Bullying including online Bullying or cyberbullying:

Healey Learning Centre recognises that children who are lesbian, gay or bisexual, who are perceived to be lesbian, gay or bisexual, or who are questioning their gender may be more vulnerable to bullying, harassment, discrimination and prejudice-based harm. The school will take a strong and proactive approach to preventing and responding to such behaviour through its safeguarding arrangements, Behaviour Policy, Anti-Bullying Policy and wider culture of inclusion and respect.

All forms of discriminatory bullying are unacceptable. Staff will remain alert to the impact that bullying, discrimination or prejudice may have on a child's safety, wellbeing, mental health, attendance, engagement and willingness to seek help.

Where concerns relate to a child's welfare or safeguarding, staff must report these promptly to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead in accordance with this policy.

Children who are questioning their gender

The school will take time to understand the thoughts, feelings and individual circumstances of children who are questioning their gender. Staff will maintain appropriate professional curiosity and consider the full range of the child's experiences and needs, including relationships with family and peers, their wider social environment, bullying or discrimination, mental health, neurodiversity, SEND and any other factors that may affect their wellbeing or vulnerability.

The school will not initiate action relating to social transition. Where a child, or their parent or carer, requests that the school make changes or provide support relating to social transition, the request will be considered carefully, individually and in accordance with safeguarding, equality and human rights duties. KCSIE 2026 makes clear that schools should not initiate social transition and that decisions should be formally considered and recorded.

Any decision will be based on the best interests and welfare of the child, while also considering the safeguarding, welfare and rights of other children who may be affected. A child's wishes and feelings will be listened to and taken seriously, although the school recognises that the outcome of a request may not always be the same as the child's wishes.

The DSL, SENCO and other relevant professionals will be involved as appropriate. The school will consider any relevant clinical evidence or advice and, where appropriate, other professional advice. School staff will not attempt to provide clinical assessment or advice outside their professional competence.

Parents and Carers

Parents and carers will normally be actively involved where a child requests support relating to social transition. Their views will be treated with importance and the school will work constructively with families to determine what is in the child's best interests.

In the rare circumstances where involving a parent or carer may place the child at greater risk of harm, the matter must first be referred to the DSL, who will determine the appropriate safeguarding response before contact is made or decisions are taken.

Confidentiality

Where a child speaks to a member of staff about questioning their gender but does not ask the school to make changes to how they are treated, staff should respect the child's confidence unless there is a related safeguarding concern.

Where the conversation raises concerns about the child's welfare or safety, normal

safeguarding procedures will apply, including involving parents or carers where appropriate.

Requests for Social Transition

The school recognises that social transition is an active intervention and will therefore take a careful, individualised and evidence-informed approach to any request.

Any request will be considered in consultation with senior leaders and the DSL and will take account of:

- the child's age, maturity and developmental stage;
- the child's wishes and feelings;
- the child's overall welfare and best interests;
- mental health, SEND, neurodiversity and any other vulnerabilities;
- relationships with parents, carers and peers;
- any safeguarding concerns;
- clinical or other professional advice where available;
- the impact of any proposed action on the child and on other pupils;
- the school's duties under safeguarding legislation, the Equality Act 2010 and the Human Rights Act 1998.

Decisions and the rationale for them will be clearly documented and kept under review.

KCSIE 2026 describes social transition as an active intervention and says schools should take a **very careful approach**, recognising the limitations of the available evidence and the need for appropriate professional input.

School Facilities and Activities

The school will comply with the Education (Independent School Standards) Regulations 2014 and relevant safeguarding and equality duties when managing toilets, changing facilities, residential arrangements and single-sex sporting activities.

Pupils will not be permitted to use toilets, changing rooms or residential accommodation designated for the opposite biological sex. Where appropriate, suitable alternative arrangements will be considered to protect the safety, dignity, privacy and wellbeing of the child concerned.

Where single-sex sporting arrangements are required for safety or fairness, these arrangements will be applied in accordance with statutory guidance.

Supporting Pupils

The school aims to ensure that all children feel safe, listened to and able to seek support from trusted adults.

Support will be provided sensitively and without judgement. Staff will challenge homophobic, biphobic, transphobic or other discriminatory bullying and will ensure that concerns are addressed promptly through safeguarding, pastoral and behaviour systems as appropriate.

Where a child may require additional support, the school will consider appropriate pastoral, SEND, safeguarding, Family Help, mental health or external professional support according to the child's individual needs.

4.15 Domestic abuse

The Domestic Abuse Act 2021 defines domestic abuse as behaviour between individuals aged 16 or over who are personally connected, where the behaviour is abusive. Abuse may include physical, sexual, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological or emotional abuse. Domestic abuse may involve a single incident or a pattern of behaviour.

Children can be victims of domestic abuse in their own right. They may see, hear or experience the effects of abuse in the home, or experience abuse within their own intimate relationships. Exposure to domestic abuse can have a significant and long-lasting impact on a child's health, wellbeing, development and ability to learn.

Children may be affected even if they do not directly witness the abuse. Some children may blame themselves or experience disruption to family life as a result of domestic abuse.

Operation Encompass provides guidance and support to education settings where children may have experienced domestic abuse.

Where there are concerns that a child may be a victim of, witness to, or involved in domestic abuse, staff will follow Local Safeguarding Partnership procedures without delay.

Further information is available from organisations including the NSPCC, Refuge and SafeLives.

4.16 Radicalisation and extremism

Radicalisation is the process by which individuals come to support terrorism or extremist ideologies. Extremism is defined as vocal or active opposition to fundamental values such as democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Prevent is part of the Government's wider counter-terrorism strategy (CONTEST) and forms part of the school's safeguarding responsibilities. It does not operate

separately from safeguarding and must be considered alongside other safeguarding risks.

Radicalisation can occur through a range of influences and settings, including online environments, family, peers and wider community factors. There is no single profile of vulnerability.

Staff will remain alert to changes in behaviour that may indicate a child is at risk of radicalisation and will use professional judgement to respond proportionately. Where appropriate, the DSL may make a Prevent referral or refer to the Channel programme in line with statutory guidance.

The school complies with the Prevent Duty under the Counter Terrorism and Security Act 2015 by assessing risk, managing external speakers, ensuring appropriate online filtering and monitoring, and promoting British values through the curriculum and wider provision.

Where concerns arise, Local Safeguarding Partnership procedures will be followed.

4.17 Sharing Nudes and Semi-nudes:

The sharing of nudes and semi-nudes refers to the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18. This may occur via social media, messaging platforms, gaming services or offline sharing technologies.

The term 'nudes' is used as it is commonly recognised by young people and covers a wide range of image-sharing behaviours. Images may be shared consensually or under pressure, coercion or exploitation.

Incidents may include:

- images found online and shared as if they depict a peer
- digitally altered or manipulated images
- images used to shame, blackmail or exploit
- AI-generated or digitally manipulated imagery, including deepfakes/deep nudes.

All concerns relating to the sharing of nudes or semi-nudes, including pseudo-images, must be reported immediately to the Designated Safeguarding Lead. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether consensual or non-consensual.

The DSL will manage incidents in line with UK Council for Internet Safety guidance, assessing each case individually and considering whether police or children's social care involvement is required.

Where incidents are assessed as experimental and non-abusive, responses may be managed without police involvement, following statutory guidance. Where there are abusive or aggravating factors, referrals will be made to the police and/or children's social care.

Where appropriate, the school will support children and families to report and remove images using recognised services, including the Professionals Online Safety Helpline and Report Remove.

4.18 Staff dealing with nudes and semi-nudes – a quick guide

Always	Never
General	
Inform the DSL immediately, record the incident, and act in accordance with school online safety and child protection policies and procedures	Ask the child or young person(s) involved to disclose information regarding the imagery View, download or share the imagery yourself (if you have seen it as the child presented it to you – inform your DSL) Inform parents/carers or another member of staff
Explain to the young person that you need to report it and reassure them that they will receive help and support from the DSL	Say or do anything to blame or shame any young people involved Delete it or ask the child to delete it

	Ask the child to share or download
Confiscate and secure the device(s). Turn the device off and give it to the DSL	View the image, send, share or save the image anywhere, allow pupils to do any of the above
Image has been shared across a school network, a website or a social network:	
Identify the network and report immediately to the DSL	Send or print the image, move the material from one place to another.

The DSL role in searching devices, viewing and deleting imagery

The Education Act 2011 gives schools the power to search for and seize electronic devices where there are reasonable grounds for suspecting that the device contains prohibited items, including indecent images of children or extreme pornography.

Any decision to search a device will be taken with care and must be proportionate and lawful. Before any search takes place, staff will ensure that:

- the action is in line with the school's safeguarding and child protection policy and associated policies, including Online Safety, Behaviour and Anti-Bullying
- authorisation has been given by the Headteacher or a member of the senior leadership team with delegated authority

Imagery will only be viewed by the Designated Safeguarding Lead where this is absolutely necessary and only where:

- it is not possible to establish the facts without viewing the image
- viewing is required to determine whether a referral to Children's Social Care and/or the police is necessary
- viewing is required to enable a report to a website, platform or reporting agency to secure removal of the image
- a pupil has directly shown the image to the DSL or the imagery has been discovered on a school device or network

Where it is necessary to view imagery, the DSL will:

- never copy, print, forward or share the imagery, as this is illegal
- discuss and agree the decision with the Headteacher
- ensure viewing is undertaken only by the DSL or another authorised safeguarding lead

- ensure another member of staff is present in the room during viewing (they do not need to view the image)
- ensure viewing takes place on school premises, ideally within a senior leader's office
- wherever possible, ensure that imagery is viewed by a member of staff of the same sex as the pupil
- record the viewing within the safeguarding records, including the rationale, who was present, and any actions taken

Deleting imagery

Where the DSL determines that the matter does not meet the threshold for referral to external agencies, consideration may be given to deleting the image from the device to prevent further sharing.

Any deletion of imagery will be clearly recorded within the safeguarding records, including the rationale for this decision and confirmation that no copies were made or retained.

4.19 Children who are absent from Education:

At Healey Learning Centre, attendance is recognised as a key safeguarding issue. In line with our Attendance Policy, absences are closely monitored, recorded and followed up, and concerns are shared promptly with the referring or feeder school and relevant agencies.

Patterns of absence or non-attendance are reviewed regularly, and appropriate action is taken to safeguard pupils and promote engagement with education. This may include multi-agency working and, where appropriate, the use of Early Help processes.

We comply with statutory requirements and local authority procedures in relation to Children Missing Education (CME), part-time timetables and the prevention of off-rolling. These processes are understood by staff as essential safeguarding measures.

Where a pupil is expected to attend but does not arrive on the agreed start date, this will be reported without delay to the appropriate local authority team.

4.20 Further information and resources:

Further information and guidance relating to children in specific circumstances can be found in Annex A of Keeping Children Safe in Education 2026.

5. Part five: Children looked after and those with SEN/additional needs

5.1 Children Looked After (CLA/LAC):

Children who have experienced abuse, neglect or other forms of adversity may become looked after by the local authority. The school ensures that staff are appropriately trained and aware of their responsibilities in safeguarding and promoting the welfare of children who are looked after.

The Designated Safeguarding Lead will have oversight of:

- the child's legal status
- the name and contact details of the Virtual School Head
- care arrangements and any restrictions on contact
- who is permitted to receive information beyond educational progress
- the management of sensitive and confidential information in line with the child's best interests, wishes and feelings
- where relevant, details of the Personal Adviser for care leavers

The Designated Teacher for looked after children is responsible for:

- promoting the educational achievement of children who are looked after
- ensuring Personal Education Plans (PEPs) and related documentation are in place, reviewed and effective
- sharing relevant safeguarding information with the DSL
- managing sensitive information appropriately and lawfully

5.2 Children with SEN and disabilities

Children with special educational needs and disabilities may face additional safeguarding challenges. Research indicates that they are at increased risk of abuse and neglect and may experience additional barriers to recognising, reporting or disclosing concerns.

The school recognises that indicators of abuse may be masked by behaviours associated with a child's additional needs. Staff will not assume that changes in behaviour, presentation or injury are solely related to a child's disability and will always consider safeguarding as a possible explanation.

Staff will remain alert to both overt and subtle indicators of harm, including bullying, emotional abuse, financial abuse, and complex safeguarding issues such as Perplexing Presentations or Fabricated or Induced Illness.

The school is committed to ensuring that all pupils are supported to have a voice. Pastoral staff are available to support pupils at any time.

When working with children with SEN or disabilities, staff will consider:

- what is known about the child
- the child's developmental age and level of understanding
- how their additional needs may impact communication or behaviour
- how communication should be adapted to meet the child's needs

The DSL and SENCo will work closely together and liaise regularly. Any safeguarding concerns will be responded to promptly, with decisions made in line with Local Safeguarding Partnership thresholds and procedures.

5.3 Safeguarding Children with Medical Conditions

Healey Learning Centre recognises that children with medical conditions, including allergies, may have additional needs and vulnerabilities which require appropriate support, planning and communication between the school, parents or carers and relevant professionals.

The existence of a medical condition, or an incident relating to the management of a child's medical condition, does not in itself constitute a safeguarding concern. However, staff must remain professionally curious where the circumstances surrounding a child's medical care indicate that they may be at increased risk of abuse, neglect or exploitation.

A safeguarding concern may arise where, for example:

- relevant information about a child's medical condition is repeatedly withheld or not provided to the school;
- a child is repeatedly sent to school without medication, equipment or other essential medical support, placing them at risk;
- prescribed or necessary treatment is persistently not provided or followed and this may place the child at risk of harm;
- there are concerns about a parent or carer's ability or willingness to meet the child's medical needs;
- the child's medical condition appears to be contributing to increased vulnerability to abuse, neglect, bullying or exploitation;

- explanations regarding injuries, symptoms, medication or medical treatment raise safeguarding concerns;
- staff become concerned that a child's health needs are being fabricated, induced, exaggerated or deliberately left unmet.

Where such concerns arise, staff must report them immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead and record the concern in accordance with the school's safeguarding procedures.

The DSL or DDSL will consider the child's circumstances holistically, including information from parents or carers, health professionals and other agencies where appropriate, and determine whether additional support, Family Help, referral to Children's Social Care or other safeguarding action is required.

Children with medical conditions may also have SEND or communication needs which can create additional barriers to recognising, understanding or reporting abuse. Staff will therefore ensure that children are provided with appropriate opportunities and communication support to express concerns and that assumptions are not made that changes in behaviour, mood, presentation or injury are solely attributable to an existing medical condition.

KCSIE 2026 specifically warns against assuming indicators such as changes in behaviour, mood or injury are simply consequences of a child's condition, and highlights communication barriers, bullying and increased vulnerability among children with SEND or certain medical conditions.

The school will work in accordance with its arrangements for supporting pupils with medical conditions and allergies and will ensure that appropriate individual healthcare plans, risk assessments, emergency procedures and staff training are in place where required.

Safeguarding concerns relating to a child with a medical condition will be managed in accordance with this policy, *Keeping Children Safe in Education 2026*, relevant Local Safeguarding Partnership procedures and statutory guidance on *Supporting Pupils at School with Medical Conditions*.

5.4 Safeguarding Young Carers

Healey Learning Centre recognises that some children have caring responsibilities for a parent, sibling or other family member because of illness, disability, mental health needs, substance misuse or other circumstances. A child may not identify themselves as a young carer and their caring responsibilities may not always be known to the school.

The school will remain alert to the needs of young carers and recognises that caring responsibilities can have an impact on a child's:

- attendance and punctuality;
- attainment and engagement with learning;
- behaviour and presentation;
- emotional wellbeing and mental health;
- relationships and social participation;
- ability to participate fully in school life.

Early identification is important to ensure that young carers receive appropriate support at the right time. Staff should therefore remain professionally curious where changes in a child's attendance, behaviour, wellbeing or engagement may indicate significant responsibilities or difficulties within the family home.

Being a young carer does not in itself constitute a safeguarding concern. However, staff must consider whether a child's caring responsibilities are **excessive or inappropriate for their age or development**, whether they are adversely affecting the child's welfare, education or wellbeing, or whether the circumstances giving rise to the caring role indicate that the child or another family member may require additional support or safeguarding intervention.

Where a young carer is identified, the school will seek to understand the child's individual circumstances and views and consider appropriate support. This may include:

- pastoral support and access to a trusted adult;
- reasonable support with attendance, punctuality and engagement;
- consideration of the child's SEND, communication or mental health needs;
- liaison with parents or carers where appropriate;
- support through community-based Early Help or targeted Family Help where appropriate;
- referral or signposting to local young carer services;
- liaison with relevant local authority, health or other external services.

Where staff have concerns that a young carer is experiencing, or is at risk of, abuse, neglect or exploitation, or that their caring responsibilities are placing them at risk of significant harm, the concern must be reported immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead and recorded in accordance with the school's safeguarding procedures.

The DSL or DDSL will consider the child's circumstances holistically and determine whether further support, Family Help, Children's Social Care involvement or other safeguarding action is required.

The school will seek to ensure that young carers are **supported rather than penalised** for circumstances arising from their caring responsibilities, while maintaining high expectations for their education, attendance, wellbeing and future outcomes.

6. Part Six: A safer school

6.1 Safer Recruitment

Apex Specialist Education is committed to safeguarding children through robust safer recruitment practices and complies with the requirements of Part Three of *Keeping Children Safe in Education 2026*. Healey Learning Centre takes appropriate steps to prevent people who may pose a risk of harm from working with children and applies safer recruitment principles throughout recruitment, selection and appointment.

Before appointment, the school will complete all statutory and appropriate pre-employment checks relevant to the role. These include, where applicable:

- verification of the applicant's identity;
- verification of the applicant's right to work in the UK;
- an enhanced Disclosure and Barring Service (DBS) check, including children's barred list information where the individual will engage in regulated activity;
- prohibition from teaching and other relevant prohibition, direction, sanction or restriction checks where applicable;
- a section 128 direction check for relevant management positions;
- verification of professional qualifications where these are a requirement of the role;
- scrutiny of employment history, including exploration of gaps, inconsistencies and reasons for leaving previous employment;
- appropriate references obtained directly from referees and verified where necessary;
- further checks on individuals who have lived or worked outside the UK where appropriate; and
- any other checks required because of the nature of the role or information arising during the recruitment process.

References will be obtained before interview where possible and will not be accepted

where they are open references or have been provided directly by the applicant.

As part of the shortlisting process, the school will consider carrying out an online search on shortlisted candidates as part of its due diligence. Candidates will be informed that online searches may be undertaken. Any publicly available information identified that may affect the applicant's suitability to work with children will be considered appropriately and, where necessary, explored with the applicant. This reflects the specific KCSIE 2026 expectation.

Regulated Activity and Volunteers

The school will determine whether a role constitutes regulated activity and ensure that the appropriate level of DBS and barred list checks is undertaken.

The school recognises the changes to regulated activity introduced by the Crime and Policing Act 2026, including the removal of the previous supervision exemption in relation to volunteers.

Where a volunteer is undertaking regulated activity, an enhanced DBS check including children's barred list information will be obtained as required.

Existing volunteers whose activity became regulated activity from 1 September 2026 as a result of the legislative changes will have their children's barred list status checked in accordance with KCSIE 2026.

Where a volunteer is not undertaking regulated activity, the school will undertake an appropriate risk assessment and determine what checks and level of supervision are required. Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity.

Supply Staff, Contractors and Third Parties

Where staff are provided through a supply agency or third-party organisation, Apex Specialist Education will obtain written confirmation that the required safeguarding and safer recruitment checks have been completed and that the individual is suitable to work with children.

Contractors and their employees will be subject to the appropriate level of DBS checking according to whether they undertake regulated activity or have the opportunity for regular contact with children. A contractor for whom appropriate checks have not been obtained will not be permitted to work unsupervised or undertake regulated activity.

The school will verify the identity of individuals presenting for work and ensure that appropriate safeguarding arrangements are in place for visitors, contractors, agency staff and other adults attending school premises.

Single Central Record

Apex Specialist Education maintains an accurate and up-to-date Single Central Record (SCR) containing the required safer recruitment and vetting information.

The SCR is maintained and quality assured across Healey Learning Centre and its learning centres in accordance with statutory requirements. Appropriate checks are recorded accurately and are subject to regular leadership and governance oversight.

Recruitment Decisions

At least one member of any appointment panel will have undertaken appropriate safer recruitment training.

Recruitment decisions will be made objectively and with appropriate consideration of safeguarding, equality and the requirements of the role. Any concerns, discrepancies or information arising through checks, references, employment history, online searches or interview will be explored before an appointment decision is confirmed.

Where information raises concerns regarding an individual's suitability to work with children, the school will undertake an appropriate risk assessment and seek safeguarding or legal advice where necessary.

Full recruitment, selection, vetting, DBS, regulated activity and Single Central Record arrangements are set out in the school's Safer Recruitment Policy.

6.2 Staff Training and Induction

All staff receive safeguarding training to enable them to identify indicators of abuse, neglect and exploitation and to understand how to respond appropriately.

All new staff receive a safeguarding induction on their first day, delivered by the DSL or a Deputy DSL. This includes:

- the Safeguarding and Child Protection Policy
- the Staff Code of Conduct
- Behaviour and Positive Behaviour Support policies
- procedures for children missing education
- reporting and recording concerns
- the identity of the DSL and Deputy DSLs
- Guidance for Safer Working Practice (2022)

Supply staff and volunteers are informed of safeguarding arrangements, reporting processes and the identity of safeguarding leads. They are provided with safeguarding guidance appropriate to their role.

All staff, including the Headteacher, receive safeguarding updates at least annually and regular updates throughout the year via briefings, meetings and written communication.

The DSL and Deputy DSLs update their safeguarding knowledge at least annually through training, professional forums and additional learning, in addition to

completing formal DSL refresher training every two years.

6.3 Whistle blowing if you have concerns about a colleague

Staff may feel apprehensive about raising concerns regarding colleagues; however, the welfare of children is always the paramount consideration.

Staff must report concerns about adults immediately to the Headteacher, including concerns about the whole-school DSL or a Centre DSL. Concerns about the Headteacher must go to the proprietor's nominated representative. Where that route presents a conflict of interest, staff must contact the LADO directly.

Staff may also contact Children's Social Care or the police directly where they believe this is necessary to protect a child.

6.4 Concerns about the behaviour and/or conduct of adults

Concerns about adults working with or on behalf of Apex Specialist Education are categorised as either:

- an allegation; or
- a low-level concern

The appropriate case manager determines the response, consulting the LADO where the harm threshold is uncertain.

All staff have a duty to report concerns and are encouraged to self-report where appropriate. Staff must report concerns immediately and provide a written account promptly. Adult allegations and low-level concerns must be held in confidential records with access restricted to those authorised to manage them. A person who is the subject of a concern must not control its handling or have routine access to the concern record.

Allegations must be reported immediately using the reporting routes in section 6.3.

Low-level concerns relating to behaviour inconsistent with the Code of Conduct or Safer Working Practice guidance must also be reported immediately.

6.5 Management of Allegations

Allegations are managed in line with Part Four of *Keeping Children Safe in Education 2026* and the Allegations Against Staff Policy.

Procedures apply where a person working with children has:

- harmed or may have harmed a child

- committed or may have committed a criminal offence against or related to a child
- behaved in a way that indicates they may pose a risk of harm
- behaved in a way that suggests they may not be suitable to work with children

The Headteacher normally acts as case manager. Where the allegation concerns the Headteacher, the proprietor acts through an appropriate representative. Conflicts of interest must be addressed with the LADO.

The case manager will promptly consult the LADO where the allegation may meet the harm threshold and agree the next steps. Necessary action to protect a child must not wait for that discussion.

Apex Specialist Education will make a referral to the Disclosure and Barring Service where the legal referral conditions are met. This includes where it withdraws permission for an employee or volunteer to undertake regulated activity, or would have done so had the person not left, and considers that the person has engaged in relevant conduct, satisfies the harm test, or has received a caution or conviction for a relevant offence.

Resignation, retirement, dismissal or another departure does not remove the referral duty. Referral to the LADO, police or another organisation does not discharge Apex's own duty to refer to the DBS. The decision must apply the statutory criteria rather than depend solely on whether an allegation has been labelled "substantiated".

Where a teacher is dismissed for serious misconduct, or would have been dismissed had they not resigned, the employer must consider referral to the Teaching Regulation Agency and record its decision and reasons.

Parents/carers will be informed in line with advice from the LADO, police or Children's Social Care and reminded of confidentiality requirements under section 141F of the Education Act 2002.

6.6 Low Level Concerns

A low-level concern is any concern that an adult may have acted inconsistently with the Code of Conduct but does not meet the threshold for an allegation.

The purpose of the low-level concerns process is to embed a culture of openness, transparency and early intervention. Concerns are recorded, reviewed and monitored to identify patterns or emerging risk.

Low-level concerns must follow section 6.3's reporting routes. Records will be reviewed for patterns and escalated to the LADO where the harm threshold may be

met. Relevant concerns about agency staff or contractors will also be shared with their employer.

6.7 Restraint, Seclusion and Parental Notification

Healey Learning Centre recognises that there are limited circumstances in which reasonable force may be necessary. Any intervention must have a lawful purpose and be justified by the individual circumstances. Force must never be used as punishment.

The school does not operate a “no contact” policy. Appropriate physical contact may be necessary to support and protect children.

Where reasonable force or restrictive intervention is necessary, it must be:

- reasonable and proportionate to the circumstances and level of risk;
- the minimum force necessary for the shortest time, ending as soon as it is safe;
- responsive to the child’s age, development, SEND, communication needs, mental health, medical conditions and known vulnerabilities;
- consistent, where reasonably practicable, with the child’s Positive Behaviour Support Plan, risk assessment and other relevant individual plans; and
- undertaken in a manner that protects the child’s safety and dignity.

Staff must not use techniques that compromise breathing, circulation or the airway. Staff likely to undertake restrictive interventions will receive appropriate training in prevention and safe, lawful intervention.

Prevention and Positive Behaviour Support

The school will seek to reduce the need for restrictive intervention through:

- understanding individual needs, triggers and functions of behaviour;
- positive relationships and trauma-informed practice;
- reasonable adjustments;
- de-escalation and regulation strategies;
- individual risk assessments and Positive Behaviour Support Plans;
- environmental and sensory adjustments; and
- partnership with parents, carers and relevant professionals.

Staff must recognise the additional vulnerabilities of children with SEND, mental health needs or medical conditions when planning support and responding to behaviour.

Seclusion and Other Restrictions

Seclusion involves confining a pupil away from others and preventing them from leaving. It may include blocking an exit or making the pupil believe that leaving will lead to punishment. Restraint can also occur without physical contact.

Seclusion must only be considered as a necessary safety response to protect others from harm during significant dysregulation. It must not be enforced through threats of punishment. The pupil must be supervised throughout and released as soon as the immediate risk reduces.

Recording and Parental Notification

The school will record every significant use-of-force incident and every seclusion, restraint or immobilisation incident covered by Independent School Standard 16A, including relevant non-contact interventions. Records must be made in writing as soon as practicable, normally the same day, including where the intervention formed part of an agreed support plan.

The record must identify those involved and document the circumstances, reason, intervention, duration, injuries, support and follow-up actions.

Information about each reportable incident must be provided to each parent as soon as practicable. It must be withheld from a parent where disclosure would be likely to cause significant harm to the pupil. If no parent can safely be informed, the school must notify the local authority where the pupil is ordinarily resident.

The school will record who was informed, when and how, and the reasons for withholding information. Detailed procedures will reflect Independent School Standards 16A and 32A.

Support, Safeguarding and Review

Following an incident, the school will:

- check the immediate welfare of the child and staff and arrange first aid or medical attention where necessary;
- offer the child a sensitive opportunity to share their views, using appropriate communication support;
- provide suitable support and a debrief for those involved;
- review the child's risk assessment, Positive Behaviour Support Plan and other relevant plans;
- consider whether unmet safeguarding, SEND, health or pastoral needs contributed to the incident; and
- consider whether the intervention raises concerns about an adult's conduct.

Where an incident raises an allegation or concern that an adult has harmed or may have harmed a child, committed a relevant offence, or may pose a risk to children, the school will follow **Section 6.5 – Allegations Against Staff**. The appropriate case manager will consult the Local Authority Designated Officer where the harm threshold may be met or there is uncertainty about the threshold.

Concerns below the harm threshold will be addressed through the school's low-level concerns procedures where applicable.

Leaders will monitor incidents across sites, identify repeated use affecting individual pupils, evaluate prevention strategies and act on patterns requiring additional support or scrutiny. Relevant findings will inform safeguarding oversight by the proprietor and governing body.

The school will have regard to *Keeping Children Safe in Education 2026* and the Department for Education's *Restrictive interventions, including use of reasonable force in schools*. This section must be read alongside the school's Behaviour Policy and detailed restrictive intervention procedures.

6.8 Abuse of position of trust

All staff understand that they are in a position of trust. Any sexual activity between a staff member and a child under 18 is unlawful under the Sexual Offences Act 2003, regardless of consent.

Staff conduct, including online behaviour and relationships outside school, must not compromise safeguarding.

6.9 Online Safety and Technology Management

Healey Learning Centre recognises that technology is an important part of education and children's lives but can also expose children to safeguarding risks. Online safety is treated as an integral and interrelated part of the school's whole-school safeguarding approach, curriculum, staff training, parental engagement and safeguarding arrangements.

The school considers the four broad areas of online risk:

- **Content** – exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm and suicide content, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories;
- **Contact** – harmful online interaction with other users or generative AI applications that simulate such interaction, including peer pressure, inappropriate commercial contact and adults posing as children or young adults for the purposes of grooming or sexual, criminal, financial or other exploitation;
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, including online bullying and making, sending or receiving explicit images, including images generated or manipulated using AI; and
- **Commerce** – risks including online gambling, inappropriate advertising, phishing, scams and other forms of financial harm.

These updated categories expressly include **generative AI within contact risks and AI-generated explicit imagery within conduct risks**.

Online safety is underpinned by the school's Safeguarding and Child Protection Policy, Behaviour Policy, Anti-Bullying Policy, Online Safety Policy, Acceptable Use Agreements and relevant curriculum arrangements.

Filtering and Monitoring

Healey Learning Centre uses **SENSO** as part of its filtering and monitoring arrangements across school technology and networks.

Appropriate filtering and monitoring systems are maintained to reduce children's exposure to harmful and inappropriate online material and to enable safeguarding concerns to be identified and acted upon.

Filtering and monitoring systems support, but do not replace, effective staff supervision, professional curiosity and safeguarding vigilance.

Filtering will seek to block harmful and inappropriate content without unreasonably restricting teaching, learning or access to appropriate safeguarding information.

Staff will actively supervise pupils' use of technology, including through appropriate classroom organisation, screen positioning and awareness of the websites, applications and services pupils are accessing.

Alerts, reports or concerns generated through monitoring systems or identified through staff observation will be reviewed and acted upon appropriately.

Annual Filtering and Monitoring Review

The effectiveness of the school's filtering and monitoring arrangements will be formally reviewed **at least once every academic year**.

The review will be led by the **SLT member responsible for filtering and monitoring**, with support from the DSL and the school's IT support/provider.

The review will include:

- checks that filtering is operating effectively on **all internet-connected devices in all relevant locations** across Healey Learning Centre;
- consideration of whether monitoring arrangements continue to meet the school's safeguarding needs;
- consideration of pupils' ages, SEND, vulnerabilities and those at greater risk of harm;
- consideration of emerging technologies and online risks;
- confirmation that harmful and inappropriate content is appropriately restricted without unreasonable over-blocking;
- consideration of whether staff understand the systems in place and how concerns should be escalated; and
- identification and completion of any required actions or improvements.

A record of the review, checks undertaken, identified issues, actions and outcomes will be maintained.

This directly reflects the strengthened KCSIE 2026 requirement for the annual review, responsible SLT lead, DSL/IT involvement, device/location checks and recorded evidence.

Filtering and monitoring will also remain subject to ongoing oversight throughout the year and will be considered through SLT and governance arrangements.

Recording and Responding to Online Safeguarding Concerns

Any online activity, alert, disclosure or incident which raises a safeguarding concern must be:

- reported promptly to the DSL/DDSL; and
- recorded on CPOMS in accordance with the school's safeguarding recording procedures.

The DSL/DDSL will assess the concern and determine the appropriate response. This may include protective or pastoral support, parental involvement where appropriate, preservation of relevant information or evidence, risk assessment, referral for Family Help, referral to Children's Social Care and/or contact with the police or other relevant agencies.

Actions, decisions and the rationale for safeguarding decisions will be recorded appropriately.

Where concerns involve the making or sharing of nudes or semi-nudes, including AI-generated or digitally manipulated sexual imagery, the procedures within **section 4.17** of this policy will be followed.

Roles and Responsibilities

All staff are responsible for maintaining appropriate supervision and vigilance when children use technology and for reporting online safeguarding concerns without delay.

The **DSL/DDSL** has lead safeguarding responsibility for online safety and must understand the filtering and monitoring systems and processes operating within the school. KCSIE specifically places understanding of these arrangements within the DSL's safeguarding responsibilities.

The **SLT member responsible for filtering and monitoring** will lead the formal review of the effectiveness of filtering and monitoring arrangements, supported by the DSL and IT support/provider.

The **Headteacher** will ensure that appropriate online safety, filtering, monitoring and information security arrangements are operationally effective and appropriately resourced.

The **Governing Board/Proprietor** will provide strategic oversight and assurance that appropriate filtering and monitoring arrangements are in place and that their effectiveness is reviewed at least annually.

All staff will receive appropriate safeguarding training relating to online safety, including an understanding of their roles and responsibilities in relation to filtering and monitoring, at induction and through regular safeguarding updates.

Concerns About Filtering or Monitoring Effectiveness

Where staff identify or suspect that filtering or monitoring is not operating effectively, including where harmful or inappropriate content can be accessed, the concern must be reported promptly to the DSL and the responsible member of SLT.

The matter will be escalated to the school's IT support/provider where technical investigation or action is required. Appropriate interim safeguarding measures will be implemented where necessary.

Significant concerns, identified weaknesses and remedial action will be subject to leadership oversight and, where appropriate, reported to the Governing Board/Proprietor.

Mobile Phones and Personal Devices

Healey Learning Centre operates as a **mobile phone-free environment for pupils during the school day**.

Pupils are not permitted access to their mobile phones or personal internet-enabled devices during lessons, transitions, breaktimes or lunchtime unless an individual exception has been expressly authorised by the Headteacher for a specific and legitimate reason.

Where pupils bring mobile phones into school, they will be handed in on arrival, stored securely and returned at the end of the school day in accordance with site procedures.

These arrangements reduce safeguarding risks associated with unsupervised internet access, bullying, sexual harassment, coercion and control, exploitation, inappropriate recording, making or sharing nudes or semi-nudes and access to harmful content through mobile data.

This is now particularly useful to state explicitly because KCSIE 2026 says schools should be **mobile phone-free by default** and pupils should not have access throughout lessons, transitions, breaks or lunchtime except by exception.

6.9A Artificial Intelligence (AI)

Healey Learning Centre recognises that generative artificial intelligence is developing rapidly and may provide educational benefits when used appropriately. It may also create or increase safeguarding, ethical, data protection and information security risks.

Potential safeguarding risks include:

- AI-generated or manipulated sexual imagery, including deepfakes or “deep nudes”;
- bullying, harassment or impersonation;
- grooming, coercion or exploitation through AI-enabled services;
- AI applications simulating human interaction;
- exposure to harmful, misleading or inappropriate content;
- misinformation and disinformation;
- inappropriate sharing or processing of personal or sensitive information; and
- attempts to circumvent the school's filtering, monitoring or safeguarding arrangements.

The school will consider safeguarding, privacy, data protection, intellectual property, age restrictions and information security before introducing generative AI tools for staff or pupil use.

Where generative AI is approved for educational use, appropriate risk assessment, staff oversight, access controls and filtering and monitoring arrangements will be implemented.

Pupils will be taught to use AI safely, responsibly and critically as appropriate to their age and needs.

Any use of AI which raises a safeguarding concern will be reported to the DSL/DDSL and managed in accordance with this policy and relevant Behaviour, Anti-Bullying and Online Safety procedures.

Where AI is used to create, manipulate or share sexualised images of a child, including deepfake or wholly AI-generated imagery, this will be treated as a safeguarding matter and responded to in accordance with the relevant sections of this policy.

The school's filtering and monitoring arrangements will take account of the use of generative AI. KCSIE 2026 specifically points schools to DfE guidance on safe generative AI use and confirms that filtering and monitoring requirements apply to generative AI in education.

6.10 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. Healey Learning Centre recognises that children may become involved in cybercrime intentionally or unintentionally and that some children with particular skills or interests in computing and technology may be especially vulnerable to being drawn into cyber-dependent offending.

Cybercrime is broadly categorised as:

- **Cyber-dependent crime** – offences that can only be committed using a computer, computer network or other form of technology; and
- **Cyber-enabled crime** – traditional crimes which can occur offline but are enabled at greater scale or speed through the use of technology.

Cyber-dependent offences may include:

- unauthorised access to computers, systems or networks (“hacking”), including attempting to access the school's network, systems or information without permission;
- Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks, sometimes referred to as “booting”, intended to make a computer, network or website unavailable; and
- making, supplying or obtaining malware with the intention of committing further offences, including viruses, spyware, ransomware, botnets and Remote Access Trojans.

KCSIE 2026 specifically identifies these as examples of cyber-dependent crime and highlights the increasing prevalence of offences under the **Computer Misuse Act 1990**.

Staff should remain alert to children who demonstrate an unusual or developing interest in hacking, malware, disrupting networks or other potentially unlawful technological activity. Such behaviour should not automatically be treated solely as a disciplinary matter; consideration should also be given to the child's understanding, vulnerability, motivation and whether preventative safeguarding intervention may be appropriate.

Where concerns arise, staff must report them to the DSL/DDSL. The DSL/DDSL will consider the nature and seriousness of the activity, the child's circumstances and any wider safeguarding concerns and determine the appropriate response.

Where a child is at risk of committing, or being drawn into, **low-level cyber-dependent offending**, the DSL/DDSL should consider referral to the **Cyber Choices programme**, a nationwide preventative policing programme supported by the Home Office and led by the National Crime Agency. The programme aims to

divert young people towards positive and lawful use of their computing skills and interests.

Where appropriate, the school may also seek advice or support from the police, local safeguarding partners or other relevant agencies.

Cyber Choices does **not** currently cover cyber-enabled offences such as fraud, purchasing illegal drugs online or child sexual abuse and exploitation, nor does it cover general online safety concerns or online bullying. Such concerns will be managed under the relevant safeguarding procedures within this policy.

Where cyber activity indicates that a child may themselves be experiencing abuse, exploitation, coercion, grooming or criminal exploitation, the school will respond primarily as a **safeguarding concern** and take appropriate action to protect and support the child.

6.11 Education at Home / Remote Learning

Where pupils access education remotely, safeguarding expectations remain the same. The school will ensure that staff, pupils and parents/carers understand reporting routes, online safety expectations and acceptable use requirements.

Any concerns arising during remote learning must be reported to the DSL/DDSL immediately and recorded on CPOMS.

6.12 Helping Children and Young People to Keep Themselves Safe

Pupils are taught to understand and manage risk through the curriculum and pastoral support. This includes online safety, healthy relationships, respectful behaviour, reporting concerns, and the risks associated with sharing content/images online.

The school promotes a culture where pupils are listened to and encouraged to speak to a trusted adult about any worry or concern.

7. Alternative Provision

Healey Learning Centre recognises that children accessing Alternative Provision (AP) may have complex needs and can be particularly vulnerable to safeguarding risks, including exploitation, serious violence, criminal activity, absence from education and other forms of harm.

Safeguarding arrangements for pupils accessing Alternative Provision will be robust, child-centred and proportionate to the individual child's needs and circumstances.

7.1 Pupils Placed at Apex by Other Schools or Commissioners

Where a school, local authority or other commissioner places a child with Apex Specialist Education for Alternative Provision, Apex will work collaboratively with the commissioning body to safeguard the child.

Apex Specialist Education will provide commissioners with appropriate safeguarding information and assurance regarding its provision, including confirmation that relevant safer recruitment and safeguarding checks have been completed for staff working with children.

Apex will inform the commissioning school or local authority of relevant changes or circumstances which may affect the safeguarding of a pupil, including significant changes to staffing or provision where appropriate.

The commissioning school retains responsibility for satisfying itself that the placement is safe, suitable and continues to meet the child's needs. KCSIE 2026 expressly states that where a school places a pupil with an AP provider, **the commissioning school continues to be responsible for safeguarding that pupil.**

Apex will support commissioners to undertake appropriate monitoring and review of placements and will share relevant information concerning attendance, engagement, progress, wellbeing and safeguarding in accordance with information-sharing requirements.

Safeguarding concerns arising while a pupil is attending Apex will be responded to immediately in accordance with this policy. Where appropriate, information will be shared promptly with the child's commissioning school, local authority, social worker or other relevant professional.

7.2 Healey Learning Centre Commissioning External Alternative Provision

Where Healey Learning Centre places one of its pupils with an external Alternative Provision provider, **Healey Learning Centre retains responsibility for safeguarding that pupil** and must be satisfied that the placement is safe, suitable and meets the pupil's individual needs.

Before a placement begins, appropriate due diligence and safeguarding checks will be undertaken. This will include obtaining written confirmation from the provider that appropriate safeguarding and safer recruitment checks have been completed for individuals working at the provision.

Written assurance will also be obtained that the provider will notify Healey Learning Centre of relevant changes or arrangements which may place the pupil at risk, including changes in staffing, so that the school can assure itself that appropriate safeguarding checks continue to be in place.

The school will consider, as appropriate:

- the provider's safeguarding and child protection arrangements;
- safer recruitment and DBS arrangements;
- the identity and location of the provision;
- the suitability of the environment for the individual pupil;
- the pupil's SEND, EHCP, health, communication and safeguarding needs;
- attendance and absence arrangements;
- arrangements for reporting safeguarding concerns and incidents;
- staffing and supervision;
- health and safety and risk assessment;
- online safety where relevant;
- information-sharing arrangements;
- how the pupil's progress, welfare and placement will be monitored; and
- any other risks specific to the pupil or placement.

The school will undertake its own due diligence and will not rely solely on a provider appearing on a local authority list or register. KCSIE makes clear that, although local authorities may maintain approved-provider arrangements, **schools remain ultimately responsible for provision they commission and must undertake their own safeguarding checks and due diligence.**

7.3 Knowing Where Pupils Are

Healey Learning Centre will **always know where a pupil placed in Alternative Provision is expected to be during school hours.**

The school will maintain accurate records of:

- the name and address of the Alternative Provision provider;
- the location at which the pupil is actually receiving education;
- any subcontracted provision or satellite site the pupil attends;
- the days and times the pupil is expected to attend;
- appropriate contact details for the provider; and
- attendance information.

A pupil must not routinely attend a different site, subcontracted provider or other location without the school being informed and satisfied that appropriate arrangements are in place.

This is a particularly important new KCSIE 2026 point: schools should know where the child is during school hours, including the addresses of **subcontracted provision and satellite sites**.

7.4 Attendance, Monitoring and Review

Attendance at Alternative Provision will be monitored and unexplained or unexpected absence followed up promptly.

External Alternative Provision placements commissioned by Healey Learning Centre will be formally reviewed **at least half-termly**, and more frequently where the pupil's needs, vulnerability or safeguarding circumstances require this.

Reviews will consider whether:

- the pupil is attending regularly;
- the placement remains safe;
- the provision continues to meet the pupil's individual needs;
- safeguarding arrangements remain effective;
- there have been changes in staffing, location or delivery;
- the pupil feels safe and is able to raise concerns;
- information is being shared effectively; and
- the placement should continue, be amended or cease.

KCSIE 2026 now expressly says reviews should be frequent enough — **at least half-termly** — to assure the school that the child is attending, is safe and the placement continues to meet their needs.

7.5 Safeguarding Concerns within Alternative Provision

Any safeguarding concern relating to a pupil attending Alternative Provision must be reported and responded to without delay.

Where Healey Learning Centre has commissioned the placement, the DSL/DDSL will liaise with the provider and relevant agencies and determine what protective action is required.

Where a safeguarding concern raises doubt about the safety or suitability of an externally commissioned placement, the placement will be **reviewed immediately** and, where necessary, suspended or terminated unless and until the safeguarding concerns have been satisfactorily addressed.

Where Apex is providing Alternative Provision on behalf of another school or local authority, Apex will take immediate safeguarding action in accordance with this policy and share relevant safeguarding information with the commissioner and other agencies as appropriate.

The welfare and safety of the child will take precedence over contractual or commissioning arrangements.

7.6 Information Sharing

Effective safeguarding requires timely and appropriate information sharing between Apex, commissioning schools, local authorities, social workers, Alternative Provision providers and other relevant professionals.

Relevant safeguarding information will be shared on a need-to-know basis in accordance with this policy and applicable data protection legislation.

Where a pupil moves between settings or provision changes, the DSL will ensure that relevant safeguarding information is transferred or shared promptly so that those responsible for the child understand identified risks, vulnerabilities and protective arrangements.

8.0 References

This policy has been written with due regard to the following statutory guidance and supporting documents:

Working Together to Safeguard Children (2026) – Statutory guidance

Keeping Children Safe in Education (2026) – Statutory guidance for schools and colleges

Prevent duty guidance: England and Wales (2023) (HM Government, 2023)

Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (February 2022)

Information Sharing Duty: statutory guidance for safeguarding organisations and their practitioners, (UK Government, 2026)

Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE, 2017)

What to Do If You're Worried a Child Is Being Abused – Advice for Practitioners (HM Government, 2015)

Multi-Agency Statutory Guidance on Female Genital Mutilation (2020)

Teachers' Standards (2012)

Data Protection Act 2018

UK GDPR and the Data (Use and Access) Act (2025)

Children Missing Education – Statutory Guidance (2025)

This policy should also be read in conjunction with Local Safeguarding Partnership procedures.

Education (Independent School Standards) Regulations (2014), as amended, and Independent School Standards guidance (2026)

Restrictive interventions, including use of reasonable force in schools (2026)

NICE NG225: Self-harm—assessment, management and preventing recurrence.

9.0 Associated Forms

The following forms support the effective implementation of this policy and are used operationally within the school:

- Internal notification of concern to the DSL for supply staff
- Body map for supply staff

10 Appendices

The following appendices form part of this safeguarding framework and support consistent, lawful and effective safeguarding practice:

1. Information/concerns checklist
2. Talking and listening to children
3. Taking action on child welfare/protection concerns flow chart
4. Indicators of abuse and neglect
5. Possible indicators of abuse and neglect
6. Harmful sexual behaviour risk management plan process flow chart
7. Managing concerns in relation to those who work with children flow chart
8. Governor Safeguarding Monitoring Record

Form 1: Internal notification of concern to the DSL for supply staff

FOR SUPPLY STAFF ONLY

This form is not to be used for allegations against staff.		
PART 1: INTERNAL NOTIFICATION of CP/WELFARE CONCERN TO THE DSL		
DATE and TIME of CONCERN	date	time
Name(s) of child/young person		
D.O.B.		
What is the nature of your concern		
To consider: • What is the nature of your concern • How did this come about • Where is this said to have taken place • When did it happen • Who is involved MAKE SURE THAT YOU INCLUDE THE WISHES & FEELINGS OF THE CHILD IN THE RECORD i.e. how do you feel now, what do you want to happen?		
Details		
SG Reference no: For DSL use only		

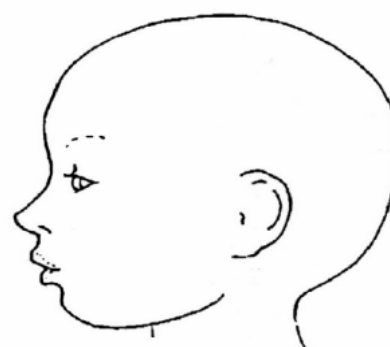
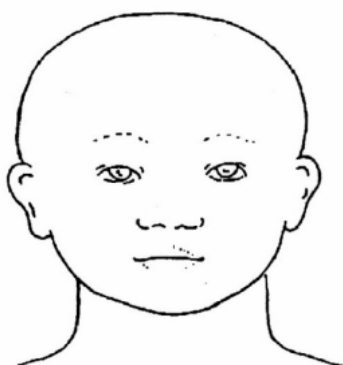
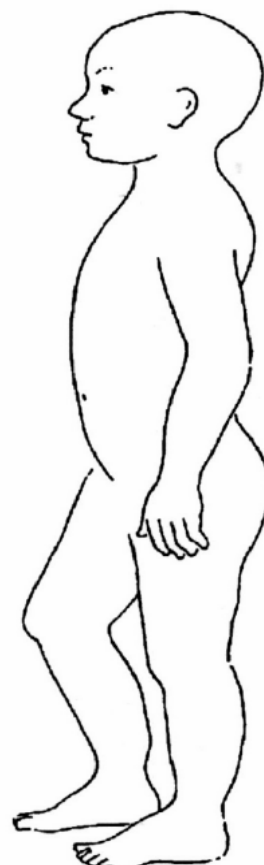
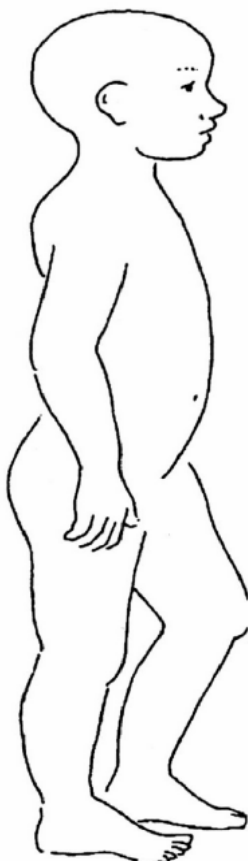
CONTINUATION SHEET ATTACHED Y/N			
Note: - Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible! - if you have used quotes please ensure that they are accurate - make a note of any open questions asked or minimal prompts used - Any notes made 'at the time' should be attached to this pro-forma; these may be required as evidence if the matter goes to court Attach a body map if relevant			
Signed			
Name (print)		Job title	
Received by the DSL			
Signed			
Name			
Date		Time	

FOR SUPPLY STAFF ONLY

Skin maps

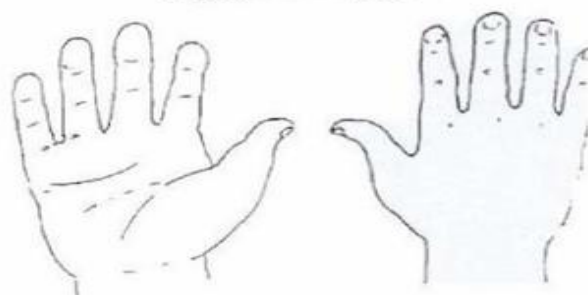
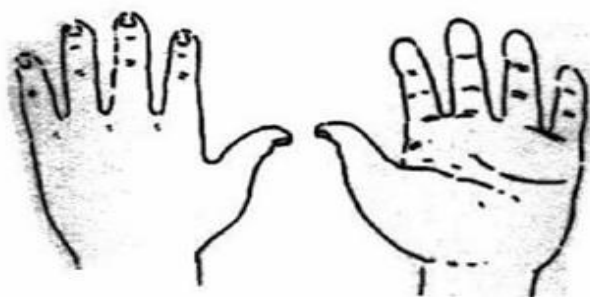
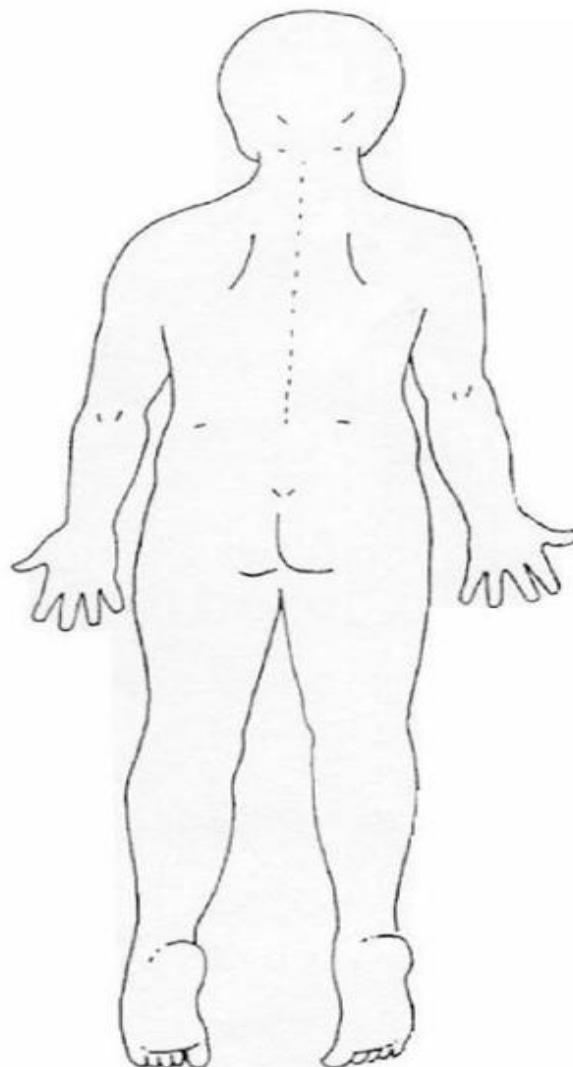
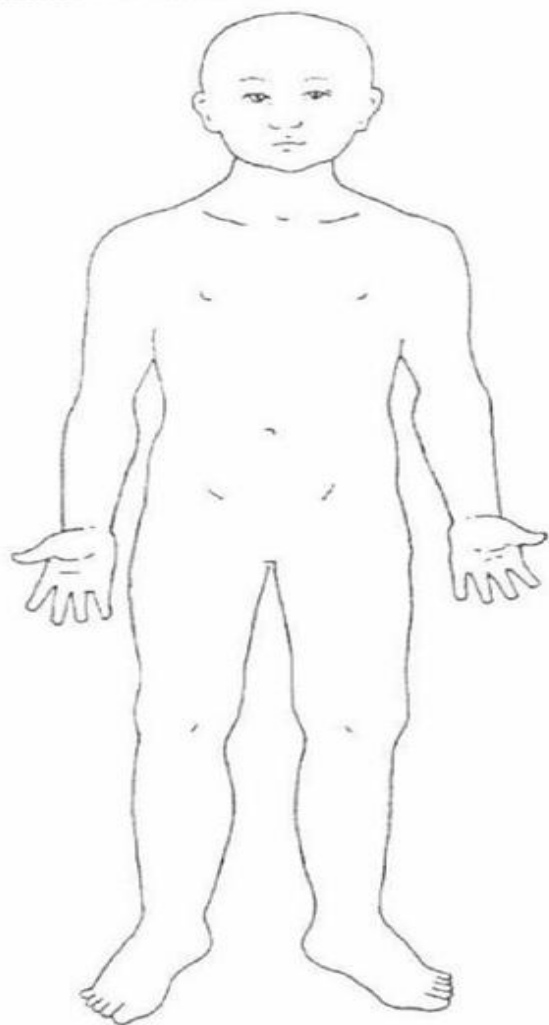
Name

d.o.b.



Name

d.o.b. ...



Name	Signature
Designation	Date
Date/Time of Incident	Injuries Identified

Appendix 1: Information /concern 'checklist'

- ☐ Does/could the suspected harm meet the Local Safeguarding Partnership definitions of abuse?
- ☐ Are there cultural, linguistic or disability issues?
- ☐ I am wrongly attributing something to impairment?
- ☐ Does the chronology indicate any possible patterns which could/do impact upon the level of risk?
- ☐ Are any injuries or incidents acute, cumulative, episodic?
- ☐ Did any injuries result from spontaneous action, neglect, or intent?
- ☐ Explanations consistent with injuries/behaviour?
- ☐ Severity and duration of any harm?
- ☐ Impacts on the child's health/development?
- ☐ Immediate/longer term effects?
- ☐ Likelihood of recurrence?
- ☐ Child's reaction?
- ☐ Child's perception of the harm?
- ☐ Child's needs wishes and feelings?
- ☐ Parent's/carer's attitudes/response to concerns?
- ☐ How willing are they to cooperate?
- ☐ What does the child mean to the family?
- ☐ What role does the child play?
- ☐ Possible effects of intervention?
- ☐ Protective factors and strengths of/for child (i.e. resilience/vulnerability)
- ☐ Familial strengths and weaknesses?
- ☐ Possibilities?
- ☐ Probabilities?
- ☐ When and how is the child at risk?
- ☐ How imminent is any likely risk?
- ☐ How grave are the possible consequences?
- ☐ How safe is this child?
- ☐ What are the risk assessment options?
- ☐ What are the risk management options?
- ☐ What is the interim plan?

Appendix 2: Talking and Listening to Children

TALKING AND LISTENING TO CHILDREN

If a child wants to confide in you, you **SHOULD**

- Be accessible and receptive;
- Listen carefully and uncritically, at the child's pace;
- Take what is said seriously;
- Reassure children that they are right to tell;
- Tell the child that you must pass this information on and inform them who this will be to
- Make sure that the child is ok;
- Make a careful record of what was said (see *Recording*).

You should **NEVER**

- Investigate or seek to prove or disprove possible abuse;
- Make promises about confidentiality or keeping 'secrets' to children;
- Assume that someone else will take the necessary action;
- Jump to conclusions, be dismissive or react with shock, anger, horror etc.;
- Speculate or accuse anybody;
- Investigate, suggest or probe for information;
- Confront another person (adult or child) allegedly involved;
- Offer opinions about what is being said or the persons allegedly involved;
- Forget to record what you have been told;
- Fail to pass this information on to the correct person (the Designated Safe-guarding Lead or Deputy DSL).

Children with communication difficulties, or who use alternative/augmentative communication systems.

- While extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in exactly the same manner as for other children;

- Opinion and interpretation will be crucial (be prepared to be asked about the basis for it and to possibly have its validity questioned if the matter goes to court).

Recordings should

- State who was present, time, date and place;
- Recorded electronically via the recognised system for recording concerns;
- Hand written records (Agency Staff) to be passed to the DSL or Deputy immediately (certainly by the end of the working day);
- Use the child's words wherever possible;
- Be factual/state exactly what was said;
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation.

What information do you need to obtain?

- Schools have **no investigative role** in child protection (Police and Children's Social Care will investigate possible abuse very thoroughly and in great detail, they will gather evidence and test hypotheses – leave this to them!);
- Never prompt or probe for information, your job is to listen, record and pass on;
- Ideally, you should be clear about what is being said in terms of **who, what, where and when**; - Use **TED (Tell me, Explain, Describe) to do this**.
- The question which you should be able to answer at the end of the listening process is 'might this be a child protection matter?'
- If the answer is yes, or if you're not sure, record and pass on immediately to the Designated Safeguarding Lead /Head Teacher or Registered Manager (head teacher/registered manager for allegations).

If you do need to ask questions, what is and isn't OK?

- **Never** asked closed questions i.e. ones which children can answer yes or no to e.g. Did he touch you?
- **Always** use **TED (Tell me, Explain, Describe)**
- **Never** make suggestions about who, how or where someone is alleged to have touched, hit etc. e.g. top or bottom, front or back?

- If the information cannot be gained via TED, we must, use only '**minimal prompts**' such as 'go on ... tell me more about that ... tell me everything that you remember about that '
- Timescales are very important: '**When was the last time this happened?**' is an important question.

What else should we think about in relation to disclosure?

- Is there a place in school which is particularly suitable for listening to children e.g. not too isolated, easily supervised, quiet etc.;
- We need to think carefully about our own body language – how we present will dictate how comfortable a child feels in telling us about something which may be extremely frightening, difficult and personal;
- Be prepared to answer the 'what happens next' question;
- We should never make face-value judgements or assumptions about individual children. For example, we 'know that [child.....] tells lies;
- Think about how you might react if a child DID approach you in school. We need to be prepared to offer a child in this position exactly what they need in terms of protection, reassurance, calmness and objectivity;
- Think about what support **you** could access if faced with this kind of situation in school.

Appendix 3 TAKING ACTION ON CHILD WELFARE/PROTECTION CONCERNS

Staff member has concerns about a child's health, development, safety or welfare

Speak to the Designated Safeguarding Lead (DSL) or a deputy DSL **immediately** and **record on the Healey Learning Centre safeguarding database (yellow form for supply staff/volunteers) before the end of the working day**

Designated Safeguarding Lead considers:

- Context & history/information available/inaccessible
- Explanations & contemporaneous life events
- Evidence and nature of risk/need
- Balance of Probabilities

DSL identifies what the level of need is via thresholds guidance & contacts the Governing Board for advice

Concern has arisen during family time in home area, or **does not** meet level 4 threshold of hosting LA Local Safeguarding Partners procedures

Share information with the allocated social worker

Concern meets level 4 of hosting LA Safeguarding Partners thresholds guidance **OR** meets level 4 of the threshold's guidance in the area where the concern has occurred and therefore child is said to be suffering or likely to suffer significant harm

Inform allocated Social Worker and parents* of intention to refer

(*unless there is a specific order in place preventing parents being informed)

NOTES: the concern is reported to the LA CSC where the concern has occurred, not to the LA CSC where the child has reported it (unless the same). Where a child has an allocated social worker in a different area, that social worker also needs to be informed. Where a child has an allocated social worker in the area where the concern has occurred, a new referral is not usually required via MASH etc. and the information is shared with the allocated social worker unless the Local Safeguarding Partnership procedures differ.

S.47 Child Protection Referral (SEE NOTES)

Telephone call to Rochdale Children's Social Care Team via:

[0300 303 0440](tel:03003030440)

CSC referral form emailed within 1working days to

ehash@rochdale.gov.uk

Appendix 4: Indicators of Child Abuse and Neglect

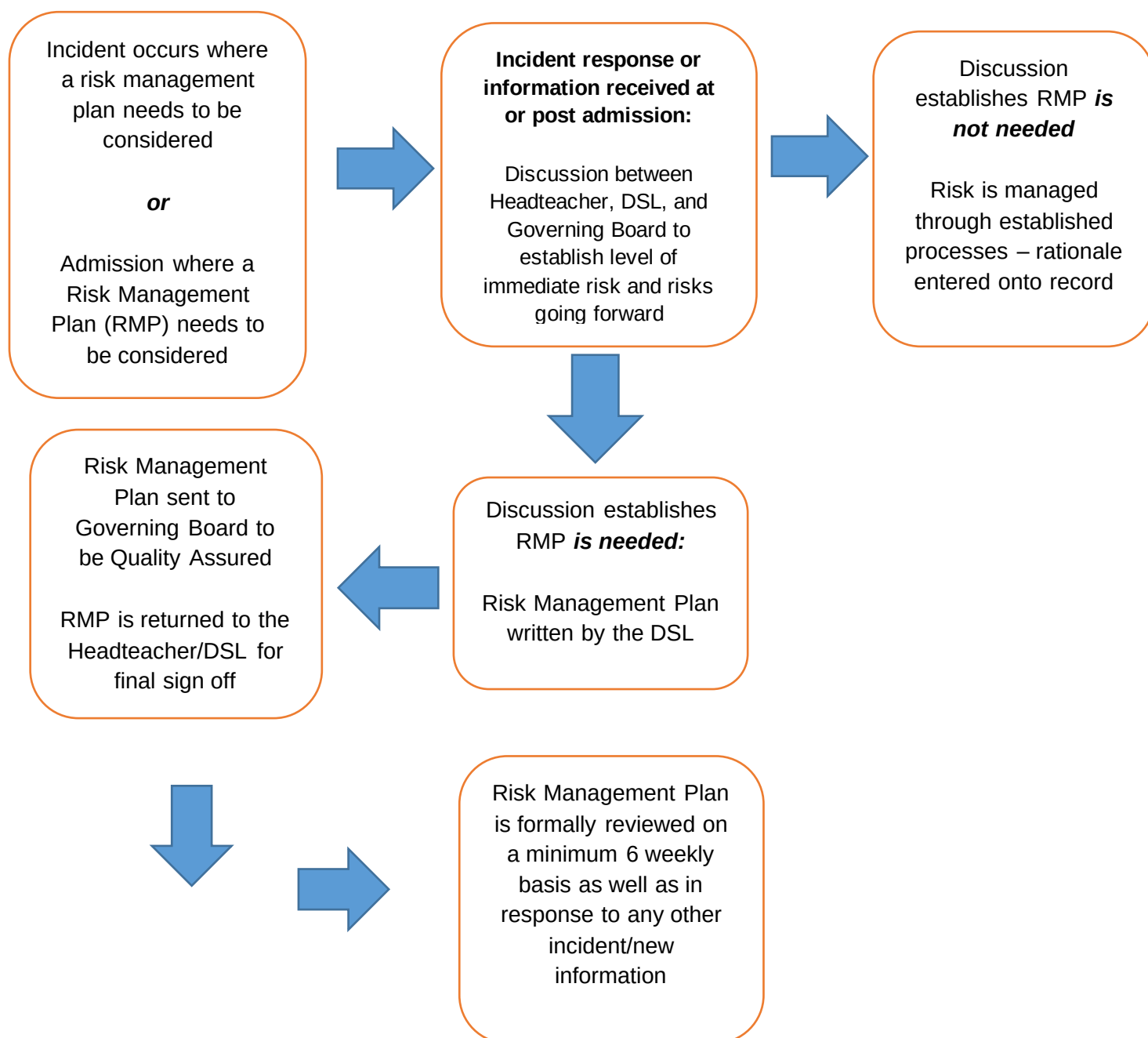
Sexual abuse involves: - Forcing or enticing, a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve: - Physical contact including assault by penetration (for example, rape or oral sex); - Non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing - They may also include non-contact activities such as: - Involving children in looking at, or in the production of sexual images; - Watching sexual activities; - Encouraging children to behave in sexually inappropriate ways; - Grooming a child in preparation for abuse. - Sexual abuse can take place online, and technology can be used to facilitate off line abuse. - Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	Emotional abuse is: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. May involve: - conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person; - not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate; - age or developmentally inappropriate expectations being imposed on children (These may include interactions that are beyond the child's developmental capability, as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction); - seeing or hearing the ill-treatment of another; - serious bullying (including cyber-bullying), - Causing children frequently to feel frightened or in danger; - The exploitation or corruption of children. - Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
Physical abuse may involve: - Hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. - Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	Neglect is : The persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development; - Neglect may occur during pregnancy as a result of maternal substance misuse; - Once a child is born, neglect may involve a parent or carer failing to:

Perplexing Presentations/Fabricated Illness - The carer does not physically harm the child but reports a clinical story, which is fabricated. This is frequently 'supported' by false specimens e.g. use of menstrual or animal blood; Induced Illness - The carer inflicts harm on the child e.g. poisoning, suffocation, tearing etc.	- Provide adequate food, clothing and shelter (including exclusion from home or abandonment); - Protect a child from physical and emotional harm or danger; - Ensure adequate supervision (including the use of inadequate care-givers); - Ensure access to appropriate medical care or treatment. - It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
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Appendix 5 Possible Indicators of Child Abuse and Neglect

Neglect	Emotional Abuse	Physical Abuse	Sexual Abuse
Tired/listless Unkempt Poor hygiene Untreated medical conditions Medical appointments missed Constantly hungry or stealing food Over eats when food is available Poor growth Poor/late attendance Being regularly left alone or unsupervised Dressed inappropriately for the weather condition Having few friends and/or being withdrawn	Failure to thrive Attention seeking Over ready to relate to others Low self esteem Apathy Depression/self-harm Drink/drug/solvent abuse Persistently being over protective Constantly shouting at, threatening or demeaning a child Withholding love and affection Regularly humiliating a child	Unexplained injuries Injuries on certain parts of the body Injuries in various stages of healing Injuries that reflect an article used Flinching when approached Reluctant to change Crying/ instability Afraid of home Behavioural extremes Apathy/depression Wanting arms and legs covered even in very hot weather	Age-inappropriate sexual behaviour/knowledge/promiscuity Wary of adults/ running away from home Eating disorders/depression/self-harm Unexplained gifts/ money Stomach pains when walking or sitting Bedwetting Recurrent genital discharge / infections Sexually transmitted diseases

Harmful Sexual Behaviour Risk Management Planning Process Chart



Appendix 7: Managing concerns in relation to those who work with Children

Member of staff reports an allegation/conduct concern to the Headteacher (*Case Manager) immediately. Member of staff to document the concerns/disclosure before the end of their working

Headteacher undertakes basic fact finding

Allegation criteria met/may be met?

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children

NO

Follow the low level concerns policy

If the child has suffered significant harm, case manager liaises with the DSL and follows the child protection policy and make a referral to CSC

YES

Discuss with Proprietor, including consideration for suspension (complete consideration for suspension on CPOMS)

Case manager contacts the LADO

The discussion considers, the nature, content and context of the allegation and agrees a course of action

3 possible courses of action

Further enquires, discussion with LADO to determine next steps

Internal Investigation

Strategy Meeting held

LADO and case manager, discuss and agree an outcome

Case Manager to complete the record within **FIVE days** of a conclusion being agreed

Where an adult makes an allegation that they were abused as a child, they will be advised to report it to the police

Apex Specialist Education Governor Safeguarding Monitoring Record

Governor Name:

Role: Safeguarding Link Governor / Proprietor Representative

Date of Visit / Review:

Sites Reviewed: ☐ Rochdale ☐ Stockport ☐ Altrincham

1. Leadership & Governance

- Is safeguarding leadership clear across all sites? ☐ Yes ☐ Partial ☐ No
- Is the DSL model effective and sustainable? ☐ Yes ☐ Partial ☐ No
- Evidence of challenge to leaders?
Notes:

2. Policy & Compliance

- Policy aligned to KCSIE 2026? ☐ Yes ☐ No
- Staff aware of policy and procedures? ☐ Yes ☐ Partial ☐ No
- Multi-site arrangements understood? ☐ Yes ☐ Partial ☐ No

3. Training & Culture

- Staff safeguarding training up to date? ☐ Yes ☐ Partial ☐ No
- Low-level concerns understood and used? ☐ Yes ☐ Partial ☐ No
- Staff confidence to raise concerns? ☐ Yes ☐ Partial ☐ No

4. Safeguarding Practice & Records

- CPOMS used consistently across sites? ☐ Yes ☐ Partial ☐ No
- Decision-making and rationales clear? ☐ Yes ☐ Partial ☐ No
- File transfers timely and secure? ☐ Yes ☐ No

5. Children at Greater Risk

- Children with SEND / social workers identified? ☐ Yes ☐ No
- Contextual risks understood at each site? ☐ Yes ☐ Partial ☐ No
- Impact on attendance/engagement monitored? ☐ Yes ☐ Partial ☐ No

6. Actions & Follow-Up

Strengths Identified:

Areas for Development:

Actions Agreed:

Timescales:

Responsible Person:

Governor Signature:

Date: