ENCOURAGING EXCELLENCE, NURTURING TALENT!

SPORTING CHANCES GROUP

CHILD PROTECTION & SAFEGUARDING POLICY

Lead	Emma Marshall
Last Reviewed	November-2026
Next Review Date	September-2027

To be reviewed **annually**.

This policy is enforced across **all** Sporting Chances Group provisions.

SPORTING CHANCES SURREY

SPORTING CHANCES OUTREACH

SPORTING CHANCES MINI

CREATIVE HAIR&LASHES

SPORTING CHANCES ONLINE

SPORTING CHANCES FITNESS

SC FOOTBALL ACADEMY

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1. AIMS & PRINCIPLES

SCG is committed to safeguarding and promoting the welfare of every child and young person who accesses its provision. The safety and welfare of students is paramount.

This policy aims to ensure that:

- concerns are identified and acted on promptly, with the child's welfare at the centre of decisions;
- use SCG pastoral leads to support children wherever possible
- all staff understand their safeguarding duties and know how to recognise, record and report concerns;
- students are listened to, taken seriously and helped at the right time;
- SCG works effectively with children's social care, police, health services and other safeguarding partners;
- staff and other adults are recruited safely and concerns about their conduct are managed consistently;
- safeguarding practice is reviewed, monitored and improved.

Core Rule
Safeguarding is everyone's responsibility. Maintain an '***it could happen here***' mindset. If you are worried about a child, act immediately and do not wait for proof.

Where there is a conflict between routine procedures and a child's immediate safety, staff must take the action necessary to protect the child and contact the DSL, children's social care or police as appropriate. This policy sets out minimum expectations; staff must also follow current local safeguarding partnership procedures and relevant statutory guidance.

SCG recognises that children may be at risk of harm in the home, in the provision, in the community, in other education or vocational settings and online. Abuse may be perpetrated by adults or by other children, and children may experience several forms of harm at the same time. Staff must remain professionally curious, avoid assumptions based on a child's presentation or family circumstances, and consider whether changes in attendance, behaviour, relationships or emotional wellbeing may indicate unmet safeguarding needs.

Safeguarding is everyone's responsibility. SCG will maintain a child-centred culture in which

the welfare and wishes of the child are considered, children are listened to, and action is taken promptly where there is a concern. No single member of staff will have the complete picture of a child's circumstances; information must therefore be shared appropriately so that concerns can be identified cumulatively.

2. LEGISLATION & STATUTORY GUIDANCE

This policy is intended to be applied in accordance with the current law and statutory guidance in England, **including:**

- Keeping Children Safe in Education 2026 (KCSIE), including Part One, which all staff must read in full;
- Working Together to Safeguard Children 2026;
- Children Act 1989 and Children Act 2004;
- Education Act 2002, including the safeguarding and welfare duty applicable to the provision;
- Equality Act 2010 and the Public Sector Equality Duty, where applicable;
- Data Protection Act 2018 and UK GDPR and the Data (Use and Access) Act 2005, together with current statutory information-sharing guidance;
- Counter-Terrorism and Security Act 2015 and the Prevent duty guidance;
- Domestic Abuse Act 2021, including section 49A, and current statutory guidance concerning the Operation Encompass police notification duty;
- Female Genital Mutilation Act 2003 and applicable mandatory reporting requirements;
- Safeguarding Vulnerable Groups Act 2006, relevant safer recruitment requirements and current DBS guidance; and
- other relevant statutory guidance on attendance, children missing education, online safety, sexual violence and harassment, exploitation and child-on-child abuse.

The DSL and policy owner must check the latest versions of guidance at each annual review and when notified of a material change. This policy does not reproduce statutory guidance; staff must consult the original guidance where required.

Key official sources:

- *Keeping Children Safe in Education (KCSIE)*[1]
- *Working Together to Safeguard Children*[2]
- *Information Sharing to Safeguard Children and Young People*[3]
- *Operation Encompass - Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass*[4]

Where statutory guidance is updated during the policy year, the DSL and senior leadership must assess whether SCG's procedures, staff training, referral routes or linked policies require immediate amendment. A policy review must not be postponed where a change affects a child's safety or a statutory duty.

Relevant duties and guidance include the Children Acts 1989 and 2004, Education Act 2002, Equality Act 2010, Human Rights Act 1998, Data Protection Act 2018 and UK GDPR, the Prevent duty guidance, statutory guidance on children who run away or go missing, and current guidance on sharing nudes and semi-nudes. The precise duties that apply may depend on SCG's legal status, registration and commissioning arrangements; the policy owner must confirm this before approval.

This policy must be read and applied alongside the version of Keeping Children Safe in Education (KCSIE) in force at the time, including the sections relevant to all staff, safeguarding leadership, safer recruitment, allegations about adults and child-on-child sexual harassment and sexual violence. Staff must use current local safeguarding partnership procedures, local authority threshold documents and referral pathways rather than relying on outdated contact details or previous practice.

Links referenced in this section:

[1] Keeping Children Safe in Education (KCSIE) – *www.gov.uk/government/publications/keeping-children-safe-in-education--2*

[2] Working Together to Safeguard Children – *www.gov.uk/government/publications/working-together-to-safeguard-children--2*

[3] Information Sharing to Safeguard Children and Young People – *www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people*

[4] Operation Encompass – *www.gov.uk/government/publications/information-sharing-duty-operation-encompass/duty-on-police-forces-in-england-and-wales-to-notify-education-establishments-of-domestic-abuse-incidents-operation-encompass-accessible*

3. DEFINITIONS

SAFEGUARDING & PROMOTING THE WELFARE OF CHILDREN	means protecting children from maltreatment; preventing impairment of their mental or physical health or development; ensuring that children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.
CHILD PROTECTION	is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
CHILD	For this policy, a child is anyone under 18. A child's age, living arrangements, attendance at a particular type of provision or apparent maturity does not remove their entitlement to protection.
DESIGNATED SAFEGUARDING LEAD (DSL)	The Designated Safeguarding Lead is referred to as the DSL. Deputy Designated Safeguarding Leads are referred to as DDSLs. The named DSL, deputies and cover arrangements must be displayed and available to all staff.
CHILD-ON-CHILD ABUSE	is not limited to physical incidents or incidents on SCG premises. It can include bullying, sexual harassment, sexual violence, coercive or controlling behaviour, initiation rituals, discriminatory abuse and technology-facilitated harm. Online harm includes risks relating to content, contact, conduct and commerce, including harmful or deceptive uses of generative artificial intelligence.
ABUSE	includes physical, emotional and sexual abuse (including harassment, exploitation and violence) and neglect. Exploitation includes situations where a child is manipulated, coerced or pressured for another person's benefit; it can occur even where the child appears to agree or does not recognise the harm. Harm may occur face to face or through digital technology, and may be caused by adults or by other children. Child-to-parent and care-giver abuse can also occur.

4. EQUALITY, INCLUSION & CHILD-CENTRED PRACTICE

SCG will take a child-centred approach and consider each child's wishes, feelings, circumstances and best interests. Staff must listen carefully, use accessible communication where needed and avoid assumptions based on a child's identity, disability, background, behaviour or family circumstances.

SCG understands that children may be subjected to prejudice-based harm from adults and children. This includes, faith-based prejudice, racism, sexism, ablism, and other forms of discrimination. Such experiences may affect the welfare of the child, their wellbeing, mental health, and trust to seek help and support. SCG staff will remain alert to this.

Safeguarding practice must be fair, inclusive and anti-discriminatory. Staff should be alert to additional barriers to disclosure or support, including disability, special educational needs, communication needs, racism, bullying, discrimination, language barriers, isolation or fear of consequences.

Where a child has SEND, a disability or a health condition, staff should consider whether additional support, communication adjustments or a different response is needed. These circumstances must not be treated as an explanation for possible abuse without proper consideration.

SCG will challenge discriminatory language, misogyny/misandry, stereotypes, and victim-blaming. A child's identity, clothing, relationships, online activity, behaviour, previous disclosures or apparent willingness to engage must never be used as a reason to dismiss a concern. Decisions should be based on the facts, the child's circumstances and the risk of harm.

Children must have safe, accessible ways to raise concerns, including where they communicate non-verbally or require additional time, visual supports, an interpreter or an advocate. Staff should check understanding, use the child's preferred communication method where appropriate, and record the child's views accurately. Reasonable adjustments must not reduce the level of protection or delay a referral.

SCG will make safeguarding arrangements accessible to all children, including children with SEND, disabilities, communication needs, medical needs, mental health needs, children who are LGBTQ+, children from different racial, cultural or faith backgrounds, children with caring responsibilities and children who have experienced trauma or exclusion. Staff must not assume that a child's disability, diagnosis, communication style, or behaviour explains away a safeguarding indicator.

SPORT

The Equality Act 2010 permits settings to separate children by biological sex in sport where differences in physical strength, stamina or physique would otherwise put one sex at a disadvantage. Where SCG has assessed that a specific sport falls into this category and that safety requires separation, SCG staff will ensure that the sport is played in single-sex groups for the sole purpose of ensuring children's safety.

CHILDREN WHO ARE QUESTIONING THEIR GENDER

SCG will treat every child with respect and dignity. Gender non-conformity, including in clothing, hairstyle or interests, is not in itself a safeguarding concern. Staff will not initiate any change relating to social transition. Where a child or parent asks for support, staff will refer the request to the DSL, who will lead a considered, individual decision. Staff will not speak about a child's gender identity to others without a safeguarding reason.

REGULATIONS & SAFEGUARDING REQUIREMENTS RELATING TO SCHOOL PREMISES

Toilets

SCG and the staff within respective provisions should ensure that there are satisfactory and appropriate toilet facilities for both girls and boys that do not ever put at risk their safety, privacy, dignity or comfort. Children aged 8 and above should only be allowed to use toilets specific to their biological sex, including those that are gender questioning, in line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014. Where a child who is questioning their gender or is gender non-conforming does not wish to use the facilities designated for their sex, the DSL will consider whether an alternative, such as a self-contained individual toilet, can be provided without compromising the safety, privacy or dignity of that child or any other child. Any alternative arrangement will be agreed sensitively with the child and, where appropriate, their parents or carers, and recorded.

5. ROLES & RESPONSIBILITIES

5.1 ALL STAFF, VOLUNTEERS, CONTRACTORS & VISITING PROFESSIONALS

All adults working with or around students must:

- read Part One of KCSIE 2026 in full, understand this policy and follow relevant SCG procedures;
- know who the DSL and DDSLs are, how to contact them and what to do if they are unavailable;
- maintain professional boundaries and provide a safe, respectful environment;
- be alert to changes in behaviour, attendance, presentation, relationships, injuries, disclosures and online activity that may indicate harm;
- listen calmly if a child speaks about a concern; reassure them that they have done the right thing, do not promise secrecy and do not investigate or ask leading questions;
- record the child's words as accurately as possible, including date, time, context and any action taken, and report the concern to the DSL without delay;
- report concerns about an adult's conduct, including low-level concerns, under the relevant procedure;
- share information lawfully when necessary to protect a child and maintain appropriate confidentiality; and
- attend induction, training and updates and cooperate with safeguarding plans and multi-agency work.

Staff must report concerns immediately, including low-level concerns about adult conduct, changes in a child's circumstances, information received outside working hours, and incidents occurring at another setting. Staff should record what they saw, heard or were told rather than investigating or attempting to prove abuse. They must cooperate with safeguarding enquiries and keep information confidential on a need-to-know basis.

Staff must maintain professional boundaries in person and online; use only approved communication channels; avoid private or secretive contact with children; and never use personal social media or personal messaging to form inappropriate relationships. Any unavoidable one-to-one work must be conducted in line with SCG's procedures, with

appropriate visibility, recording and risk assessment.

All adults working with or around children must read the required safeguarding information, understand this policy and the Staff Code of Conduct, and know how to report a concern. This applies to temporary and supply staff, volunteers, visiting professionals, contractors and adults supporting activities at external or commissioned settings. A person must not assume that someone else has reported a concern.

5.2 DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL has lead responsibility for safeguarding and child protection, including online safety. The DSL role and contact details must be clear to staff, students and relevant families. **The DSL will:**

- act as the main point of contact for safeguarding concerns and referrals;
- make or oversee referrals to children's social care, police, the local authority designated officer (LADO) and other agencies as appropriate;
- ensure concerns, decisions, actions and outcomes are recorded securely and promptly;
- coordinate support for children subject to early help be it universal services and community-based Early Help, the targeted early help level of Family Help, child in need or child protection arrangements;
- liaise with safeguarding partners, attend or contribute to meetings and ensure relevant staff understand and implement agreed plans;
- ensure staff receive induction and appropriate training, and that the policy and procedures are communicated;
- maintain knowledge of local referral thresholds, escalation procedures and safeguarding contacts;
- ensure safeguarding information is shared on a need-to-know basis and in accordance with law and current guidance;
- oversee concerns and allegations about adults in line with the relevant procedures, including liaison with the case manager and LADO;
- contribute to monitoring, audits, learning reviews and policy updates; and
- act as SCG's principal recipient for Operation Encompass notifications, with trained deputy cover; assess the child's immediate safeguarding and welfare needs; coordinate proportionate support, information sharing, recording and referral; and confirm responsibilities with any commissioning school or local authority.

The DSL must ensure staff receive induction and regular updates, that required KCSIE information is accessible, and that filtering and monitoring concerns are escalated appropriately. Where a referral is made, the DSL must follow it up to establish what action the receiving agency will take and what SCG must do in the meantime. The DSL must escalate if a response is absent, delayed or inadequate.

The DSL should maintain an overview of safeguarding records and patterns, including repeated low-level concerns, attendance and missing episodes, child-on-child abuse, online incidents and concerns raised by external providers. Decisions should be recorded with the rationale, actions, referrals, advice sought and follow-up arrangements. The DSL must ensure that the child's wishes and feelings are considered without placing responsibility for the safeguarding decision on the child.

The DSL is the lead source of safeguarding advice and coordination and must have appropriate authority, time, training and access to senior decision-makers. The DSL will manage referrals, liaise with local authority children's social care, police, the Local Authority Designated Officer (LADO) and other agencies as appropriate, and ensure that action is taken when concerns indicate a child may be at risk of harm.

5.3 DEPUTY DSLS

DDSLs support the DSL and must be appropriately trained and able to act when the DSL is unavailable. Staff must not delay urgent action while trying to reach a particular individual.

Safeguarding information shared with a deputy must be recorded and passed to the DSL in accordance with agreed arrangements, unless doing so would create a conflict of interest or compromise the child's safety. Deputies must know the local referral routes, emergency arrangements and procedures for allegations about adults.

DDSLs must be trained to the appropriate level and must be able to take action when the DSL is unavailable. Staff must know whether to contact a deputy directly and must not delay a report while trying to reach a particular individual.

5.4 DIRECTOR, SENIOR LEADERSHIP & GOVERNANCE

SCG leadership and the relevant governing or management body are responsible for ensuring that:

- effective safeguarding policies and procedures are in place, implemented and reviewed at least annually;
- the DSL has appropriate status, time, training, resources and access to senior decision-makers;
- safer recruitment, vetting, induction and staff conduct arrangements are implemented;
- staff training and policy-read acknowledgements are monitored;
- online filtering and monitoring arrangements are appropriate, regularly reviewed and acted upon;
- allegations and low-level concerns are handled fairly, promptly and in accordance with current guidance;
- safeguarding concerns, including those involving senior leaders or the DSL, can be raised with an appropriate alternative person; and
- lessons from incidents, audits and external reviews lead to improvements.

Named role holders and alternative reporting routes must be inserted into the local contacts appendix before this policy is approved.

SCG will ensure that the DSL and deputy arrangements are clear to staff and children, including arrangements for absence and out-of-hours or off-site activities. The named postholders, contact details and alternative reporting route must be kept current in the local contacts appendix and communicated during induction.

Safeguarding responsibilities must be understood across the organisation and not treated as the DSL's responsibility alone. Leaders must ensure that the policy is implemented in practice, that staff know who to contact, that concerns can be escalated safely and that sufficient time, training, resources and access to advice are available.

Leaders must ensure that staff can raise concerns about the DSL or senior leaders through a named alternative route. They must support the DSL to act independently in safeguarding matters and ensure that safeguarding concerns are not minimised to protect reputation, relationships or operational convenience.

Senior leaders and the relevant governance body must ensure that safeguarding arrangements are effective, adequately resourced and reviewed, including safer recruitment, staff training, record keeping, online safety, filtering and monitoring, alternative provision placements and management of allegations. They must seek assurance about how the arrangements work in practice, not only whether documents exist.

6. CONFIDENTIALITY & INFORMATION SHARING

Information about safeguarding concerns must be handled sensitively and shared only with people who need it to protect the child or carry out their safeguarding role. Confidentiality must never be used as a reason to delay sharing information that is necessary to safeguard a child.

- Do not promise a child or another person that information will be kept secret.
- Explain, where safe and appropriate, that information may need to be shared with people who can help keep the child safe.
- Share relevant, accurate and proportionate information promptly with the DSL or appropriate agency.
- Record what was shared, with whom, when, why and the outcome or rationale for a decision not to share.
- Seek advice from the DSL or data protection lead where needed, but do not delay urgent protective action.
- Follow current statutory information-sharing guidance and SCG's data protection and records procedures.

Records must identify what information was shared, the recipient, date and time, the reason for sharing and any decision not to share. Where professionals disagree, the DSL should seek advice and escalate in line with local procedures; professional disagreement must not result in a child being left without protection.

Staff should share relevant information with the DSL and appropriate agencies on a need-to-know basis. They must explain to a child, where safe and appropriate, what information may need to be shared and why. Information must not be shared with a parent, carer or other person where doing so could increase risk, compromise an investigation or conflict with advice from children's social care or police.

Information sharing is essential where it is necessary to safeguard a child. Data protection legislation does not prevent the sharing of information for safeguarding purposes; staff should share information lawfully, fairly, securely and proportionately, following current information-sharing guidance. Consent is not always required where there is a safeguarding reason to share, and staff must not delay urgent action while seeking consent or legal advice.

THE USE OF 'REASONABLE FORCE'

'Reasonable force' should only ever be used to safeguard children. 'Reasonable force' should be appropriate and is the degree of physical contact to restrain or control a child. Whether or not to use 'reasonable force' is down to professional judgement firmly within the confines of the law and the context. DfE assessment advice can be found at: ***Use of Reasonable Force and Other Restrictive Interventions Guidance***[1].

Many of the students at SCG have SEND, mental health issues, and other vulnerabilitie. These factors must be carefully considered when deciding to use 'reasonable force'. To negate or reduce reoccurrence, behaviour support plans should be put in place as well as risk assessments as a form of prevention. More information and guidance can be found at: ***Reducing the Need for Restraint and Restrictive Intervention***[2].

Links referenced in this section:

[1] Use of Reasonable Force and Other Restrictive Interventions Guidance – *https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf*

[2] Reducing the Need for Restraint and Restrictive Intervention – *https://assets.publishing.service.gov.uk/media/5d1387e240f0b6350e1ab567/reducing-the-need-for-restraint-and-restrictive-intervention.pdf*

7. RECOGNISING ABUSE & TAKING ACTION

7.1 RECOGNISING CONCERNS

Abuse, neglect and exploitation (including sexual and financial) may occur within families, in institutions, between peers, in the community or online. A child may experience more than one form of harm. Indicators are not proof, and the absence of visible indicators does not mean that a child is safe.

Staff should consider patterns and context, including unexplained injuries, fearfulness, changes in mood or behaviour, poor attendance, disclosures, concerning relationships, sexualised behaviour, missing episodes, unexplained gifts or money, online threats, neglect of basic needs or signs of exploitation.

No list can identify every child at risk. Staff should consider what is known about the child, their communication and developmental needs, family circumstances, peer relationships, online life, attendance and any previous concerns. Patterns across separate incidents may be significant even where each incident appears minor in isolation.

Possible indicators include unexplained or repeated injuries, fear of particular people or places, extreme compliance, aggression, regression, poor hygiene, hunger, persistent tiredness, sexualised language or behaviour that is not developmentally expected, self-harm, unexplained gifts, money or possessions, secretive online relationships, coercion, threats, or changes linked to contact with a particular person.

7.2 IF A CHILD TELLS YOU SOMETHING

1. Stay calm, listen carefully and take the child seriously.
2. Allow the child to speak in their own words. Use only open, minimal prompts needed to understand immediate safety.
3. Do not investigate, confront the alleged person responsible or ask the child to repeat the account unnecessarily.
4. Do not promise confidentiality. Explain that you will tell the people who need to help keep them safe.

5. Reassure the child that they are not to blame and that they have done the right thing by speaking.
6. Record the disclosure and report it to the DSL immediately.

Make a prompt, factual record using the child's words where possible, noting the date, time, location, people present, questions asked and the child's presentation. Separate direct observations from interpretation and report to the DSL immediately. If the concern involves the DSL, use the alternative route.

Tell the child that the information will be passed to people who can help keep them safe. Explain the next steps in language they can understand, taking account of age, SEND and communication needs. Do not confront the alleged person responsible, arrange mediation or conduct your own investigation.

Listen without showing shock or disbelief. Do not ask leading questions, suggest answers, promise secrecy, make promises about outcomes or ask the child to repeat the account to multiple adults. Clarifying questions should be limited to what is necessary to understand immediate safety and the nature of the concern.

7.3 REPORTING & REFERRAL

All concerns must be reported to the DSL or DDSL without delay and recorded using the current SCG concern-recording procedure. A concern form should be completed as soon as possible, normally on the same day.

The DSL will assess the concern, consult local threshold guidance where appropriate and decide on next steps. These may include monitoring, early help, referral to children's social care, a police referral, a strategy discussion or other multi-agency action. The DSL must record the rationale for decisions and follow up to ensure that the child receives an appropriate response.

Immediate Danger
If a child is in immediate danger or a crime is in progress, call 999. Do not wait for permission from the DSL. If urgent action is required and the DSL/DDSL cannot be reached, contact the appropriate children's social care service or police directly, then inform SCG leadership as soon as possible.

Where a referral is made, SCG should record the information provided, who received it, when it was made, the advice or decision returned and the agreed follow-up. If the receiving agency does not respond, does not take action or the risk increases, the DSL must re-contact the agency and escalate using local safeguarding partnership procedures. The child must be supported while decisions are pending.

The DSL must consider the urgency, level of risk, child's wishes and feelings, family context, previous history and whether other children may also be at risk. Depending on the concern, action may include immediate protection, a referral to children's social care, police contact, a strategy discussion, early help or coordinated support with other agencies. Staff must not assume that a referral has been accepted simply because it has been sent.

7.4 EARLY HELP

SCG staff should familiarise themselves with the process for community-based Family Help Assessments to develop a clearer understanding of how levels of need are identified and responded to. Further guidance can be found in Sections 10 and 11 of the ***Children Act 2004***[1].

In summary:

Section 10: Cooperation to Improve Well-being

Places a statutory duty on local authorities and designated partner agencies, including health services, the police, and probation services, to work collaboratively to improve outcomes for children and young people within their area. This duty encompasses promoting health and well-being, safeguarding children from harm, supporting educational achievement, and improving social and economic outcomes.

Section 11: Arrangements to Safeguard & Promote Welfare

Section 11 requires specified agencies and organisations to have arrangements in place to safeguard and promote the welfare of children. This duty:

- Supports and strengthens the collaborative responsibilities set out in Section 10.
- Ensures safeguarding and child welfare are prioritised within organisational policies and practice.
- Promotes the timely sharing of information, concerns, and risks to enable early intervention and preventative support.

- Recognises children as vulnerable individuals whose needs must be identified, assessed, and responded to appropriately.

Together, Sections 10 and 11 provide the legislative framework for effective multi-agency working, early help, and the safeguarding and promotion of children's welfare.

Early help should be considered when a child's needs are emerging or escalating but may be addressed through coordinated support before statutory intervention is required. Staff should share concerns with the DSL, contribute to assessments and plans, and support the child and family as agreed. Early help must not delay a child protection referral where significant harm may be a concern.

Staff should contribute relevant observations and monitor whether support is improving safety and wellbeing. If circumstances worsen, a child is not engaging, risks persist or new information emerges, the plan must be reviewed and escalated without delay.

Early help is a collaborative response to emerging or escalating needs and should be considered before difficulties become entrenched, while recognising that it is not a substitute for a statutory referral where significant harm is suspected. The DSL should use local threshold guidance and work with the child and family, where safe, to identify strengths, needs, desired outcomes and appropriate support.

7.5 NO RESPONSE OR DISAGREEMENT

If staff believe a concern has not been acted on appropriately, they must escalate it to the DSL's line manager, Director or other designated senior person. If necessary, staff should contact children's social care or police directly. Local safeguarding partnership escalation procedures must be followed where agencies disagree about a child's needs or response.

Immediate danger, a serious injury, a suspected crime in progress or an urgent risk to a child requires emergency action. Contact police or emergency services where necessary and inform the DSL as soon as possible. The safeguarding route must not replace emergency action.

Staff must be alert to cumulative harm and to the possibility that a child may be both harmed and causing harm. A child who is involved in offending, exploitation, bullying or harmful sexual behaviour may also be a victim and may require protection and support. Staff must avoid labels that blame the child or make it harder for them to disclose.

Staff must act on concerns even where there is no proof, the child has not made a formal disclosure or the information is incomplete. A child may communicate through behaviour, play, drawings, changes in presentation, repeated absence, withdrawal, aggression, sexualised behaviour or changes in peer relationships. Indicators should be considered in context and over time.

No staff member will be disadvantaged for raising a genuine safeguarding concern in good faith. Where a concern relates to the DSL, Director or another senior person, staff must use the alternative reporting route and may contact the appropriate external agency if internal escalation is unsafe or ineffective.

Any staff member who remains concerned after a referral or internal report must continue to pursue the concern. They should record the steps taken, speak to the DSL or senior leader, seek advice from the relevant local safeguarding agency and make a direct referral where appropriate. A professional disagreement must be managed through local escalation procedures, with the child's safety as the priority.

Links referenced in this section:

[1] Children Act 2004 – *www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_20040031_en.pdf*

8. SPECIFIC SAFEGUARDING ISSUES

The following issues require particular vigilance. This list is not exhaustive. Staff must report concerns through the same safeguarding route and use the relevant SCG procedure and current statutory guidance.

CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT, VIOLENCE & EXPLOITATION)

Child-on-child abuse can be prevented and should be viewed by SCG staff as a safeguarding concern for both child and alleged perpetrator. Abuse between children can include bullying, physical abuse, sexual violence, sexual harassment, coercive or controlling behaviour,

initiation/hazing, weapons, image-based abuse and online abuse. It is serious and must never be dismissed as banter (for example misogynistic behaviours), mutual conflict or an inevitable part of growing up. Consider the needs and safety of all children involved, avoid victim-blaming and refer to the DSL promptly.

Staff must be alert to patterns, including repeated incidents involving the same child, sexualised comments, discriminatory abuse, coercive behaviour, threats, group dynamics or online sharing. Behaviour by a child who has caused harm must be addressed in a way that protects others and considers that child's own safeguarding needs.

The DSL should consider immediate separation or supervision where needed, safety planning, support for affected children, risk to other children, appropriate referrals and the impact of any response on access to education. The provision must not use mediation or restorative approaches where these could place a child at risk or create pressure to reconcile. Records must be factual and must avoid victim-blaming.

All reports of child-on-child abuse must be taken seriously and acted upon. It can occur in person or online, inside or outside the provision, between children of any age or sex, and in relationships where there is an imbalance of power, coercion or fear. It must not be dismissed as banter, mutual conflict, a relationship issue or behaviour that children should manage themselves.

SEXUAL VIOLENCE & SEXUAL HARASSMENT

Take reports seriously, act promptly, consider immediate safety and support, and follow the DSL-led response. Do not promise a particular outcome or undertake an informal investigation. The DSL will consider referrals, risk assessments, support and the need to involve parents/carers, taking account of the child's safety and current guidance.

Risk assessments should be reviewed as circumstances change and should consider location, timetabling, transport, online contact, supervision, emotional support and the risk of repeated or retaliatory behaviour. Information should be shared only with those who need it. The provision must follow current KCSIE Part Five and local procedures, including specialist advice where appropriate.

Every report must be taken seriously, including where there are no witnesses, the children have previously been in a relationship or the child does not want formal action. The DSL should consider immediate safety, the child's wishes and feelings, whether police or children's social care should be contacted, support for all affected children, and measures to prevent

further contact or retaliation. Staff must not promise a particular outcome or conduct an informal investigation.

Sexual harassment and sexual violence can occur between children of any age or sex, in person or online, and may be a one-off incident or part of a pattern. Sexual harassment includes unwanted sexual comments, sexualised name-calling, sexual jokes, unwanted touching, sexualised bullying and online behaviour. Sexual violence includes rape, assault by penetration and sexual assault as defined in current guidance and law (KCSIE, 2026).

HARMFUL SEXUAL BEHAVIOUR (HSB)

Children's sexual behaviour often develops normally. SCG staff should refer to the ***NSPCC Guidance: Sexual Development & Behaviour in Children***[1] to gain further knowledge of the typical stages of sexual development in children. When sexual behaviour becomes problematic or abusive, intervention is required. Those children involved in sexual behaviour with someone more than 2 years older than them or when there is a power indifference, could be harmed. Guidance on how to respond appropriately to children displaying sexualised behaviours is available from the NSPCC in ***Responding to Children Who Display Sexualised Behaviour***[2]. SCG staff must inform the DSL if they have concerns.

CHILD SEXUAL EXPLOITATION & CHILD CRIMINAL EXPLOITATION

Be alert to coercion, grooming, gifts, debt, threats, missing episodes, unexplained money or possessions, association with unsafe adults or groups, and being drawn into offending or sexual activity. Children may not recognise themselves as victims.

Staff should report unexplained money or possessions, missing episodes, association with unsafe adults or older peers, sudden changes in attendance or behaviour, sexual activity linked to exchange, threats, criminal activity or pressure to carry items or drugs. The DSL should consider whether other children are at risk and liaise with specialist services and police where appropriate.

Exploitation may involve grooming, manipulation, coercion, threats, violence, gifts, money (financial), status, accommodation, transport, debt or the promise of affection. A child may not recognise that they are being exploited or may appear to participate willingly. Apparent consent does not remove the need to consider coercion, imbalance of power or exploitation.

COUNTY LINES & SERIOUS VIOLENCE

Report concerns about coercion, drug running, weapons, threats, violence, debt bondage or exploitation linked to gangs or criminal networks. A child involved in offending may also be a victim.

Staff should be aware that the profile of a number of students at SCG are high risk potential victims (and perpetrators) of serious crime. Staff should promptly share concerns about threats, unexplained injuries, weapons, gang association, intimidation, debt or changes in peer groups. The DSL should consider contextual safeguarding, taking protective action when necessary, including risks outside SCG and the child's wider peer and community networks, and seek multi-agency support.

County lines and serious violence can be seen as modern slavery, involving coercion, grooming, debt, threats to family members, weapons, exploitation of accommodation, drug supply and repeated missing episodes. Children may be moved between areas or used to transport drugs, money or weapons. Being involved in criminal activity does not mean a child is not a victim.

Where a possible victim of Child Criminal Exploitation or Child Sexual Exploitation has been identified, SCG staff should as per the ***Modern Slavery: Statutory Guidance for England & Wales (under s49 of the Modern Slavery Act 2015) & Non-Statutory Guidance for Scotland & Northern Ireland***[3], complete a child protection and modern slavery referral.

DOMESTIC ABUSE

Children may be harmed by seeing, hearing or experiencing the effects of abuse in the home or in their own relationships. Consider the child's safety, emotional wellbeing and the impact on attendance and behaviour.

Staff must not contact a person who may be causing harm or disclose information to family members without considering the risk. The DSL should follow local procedures, consider the needs of siblings and other children in the household, and seek specialist advice where appropriate.

Children may experience domestic abuse directly, witness it, hear it, or be affected by its consequences. Abuse may include physical, sexual, emotional, psychological, economic or controlling behaviour, including within adolescent relationships. The impact may be reflected in attendance, concentration, anxiety, anger, sleep, relationships or a child's sense of safety.

Staff can engage with the *Youth Endowment Fund*[4] to take protective action against children becoming involved in violence.

OPERATION ENCOMPASS

SCG recognises that children and young people who experience domestic abuse can be significantly affected emotionally, psychologically, socially and educationally.

We are committed to safeguarding and promoting the welfare of every child in our care. We recognise that children who see, hear or experience the effects of domestic abuse are victims in their own right.

Operation Encompass is the statutory duty under section 49A of the Domestic Abuse Act 2021 for police forces in England and Wales to notify a child's relevant educational establishment when police have attended a domestic abuse incident at the child's home. It enables the educational setting to consider timely safeguarding and pastoral support.

SCG is committed to working in partnership with the police, local authority, schools, families and other relevant agencies to ensure children receive timely and appropriate support.

Purpose of Operation Encompass
The purpose of Operation Encompass is to ensure that the Designated Safeguarding Lead (DSL), or appropriately trained Deputy DSL, receives information from the police following a domestic abuse incident involving a child connected to our provision.

Police notifications will be made as soon as reasonably practicable and, subject to applicable local Operation Encompass arrangements, will normally be received before the start of the next school day. SCG will verify the notification route and timescale with each relevant police force and local authority. Local arrangements will identify the secure communication channel, authorised recipients, deputy cover, arrangements during weekends, holidays and closures, and the procedure for delayed or misdirected notifications.

A notification may be made where:

- A child has witnessed domestic abuse.
- A child has heard or experienced the effects of domestic abuse.
- A child was present during a domestic abuse incident.
- A child was not physically present but lives in or is connected to the household where the incident occurred.

Receipt of an Operation Encompass notification does not by itself establish that abuse has occurred and does not replace the DSL's professional safeguarding assessment. Responsibility for issuing the notification rests with the police.

Our Responsibilities as an Alternative Provision

As an Alternative Provision supporting children and young people with Special Educational Needs and Disabilities (SEND), we recognise that domestic abuse and trauma may affect children in different ways.

Some children may have difficulties communicating their feelings, recognising unsafe situations, processing traumatic experiences or expressing that they need help.

We will therefore:

- Provide a safe, welcoming and supportive learning environment.
- Recognise that distress may be communicated through changes in behaviour, withdrawal, anxiety, anger or emotional dysregulation.
- Consider each child's individual communication needs, developmental level and additional needs.
- Use appropriate communication methods, including visual aids, symbols, social stories and other communication tools where required.
- Provide opportunities for children to communicate their worries in a safe and accessible way.
- Adopt a trauma-informed and child-centred approach.
- Avoid making assumptions about a child's behaviour or emotional presentation.
- Ensure that safeguarding concerns are taken seriously and acted upon promptly.

Commissioned Placements & Notification Routes

Before a placement begins, SCG and the commissioning school or local authority will agree in writing which educational establishment is expected to receive an Operation Encompass notification and whether, when and how relevant information will be shared with SCG.

The written arrangement will identify the child's registered or placing school, the SCG site attended, the commissioning local authority where relevant, and the named DSL and deputy contacts in each organisation. **It will specify:**

- who checks for notifications each working day;
- the secure method of transmission and acknowledgement;
- who assesses immediate risk and coordinates support;

- who makes referrals to children's social care or police;
- who decides whether and when parents or carers may be informed;
- cover during absence, holidays, closure or non-attendance;
- ownership, retention and secure transfer of safeguarding records; and
- the escalation route where information is delayed or an organisation does not respond.

These arrangements do not remove SCG's duty to act immediately on any safeguarding concern arising during the placement.

Role of the Designated Safeguarding Lead
The DSL will be the main point of contact for Operation Encompass notifications.

The DSL will:

- Receive and securely manage Operation Encompass notifications.
- Ensure information is shared only with appropriate staff who need to know.
- Consider the child's immediate welfare and safeguarding needs.
- Liaise with the child's allocated school, where appropriate, and relevant professionals.
- Ensure that suitable emotional and practical support is put in place.
- Monitor the child's presentation, attendance, behaviour and emotional wellbeing.
- Record all notifications and actions taken on the child's confidential safeguarding record.
- Make referrals to children's social care or other relevant agencies where required.

The Deputy DSL will undertake these responsibilities in the DSL's absence, subject to appropriate training and access arrangements.

Supporting Children Following a Notification
Following receipt of an Operation Encompass notification, the DSL will consider what support the child may need during their time at the provision.

Support may include:

- A familiar and trusted member of staff checking in with the child.
- Providing a calm and safe space if the child becomes distressed.
- Allowing flexibility with learning expectations where appropriate.
- Providing emotional reassurance and opportunities for the child to talk.
- Using accessible communication strategies for children with speech, language or communication needs.

- Considering sensory needs and providing appropriate adjustments.
- Monitoring changes in behaviour, presentation and emotional wellbeing.
- Working with parents, carers and other professionals where it is safe and appropriate to do so.

Staff will not pressure a child to discuss an incident or ask leading questions. If a child makes a disclosure, staff will listen carefully, reassure the child, record their words accurately and report the concern to the DSL immediately.

Confidentiality & Information Sharing
All Operation Encompass information will be treated as highly confidential safeguarding information.

Information will:

- Be stored securely within the child's safeguarding record.
- Only be accessed by the DSL, Deputy DSL and other specifically authorised individuals where necessary.
- Not be shared with other pupils, parents or staff who have no legitimate safeguarding reason to know.
- Be shared with relevant agencies where necessary to protect the child and promote their welfare.

The provision will comply with applicable data protection legislation, including the UK GDPR and Data Protection Act 2018.

Confidentiality must never prevent appropriate safeguarding action being taken.

Partnership Working & Referrals
Operation Encompass does not replace the provision's existing safeguarding procedures or the requirement to make referrals where a child may be at risk of harm.

Where concerns indicate that a child may be suffering, or be at risk of, significant harm, the DSL will follow local safeguarding partnership procedures and make an immediate referral to children's social care or the appropriate safeguarding agency.

Where a child is commissioned to attend our provision by another school or local authority, we will establish clear arrangements for the sharing of relevant safeguarding information with the commissioning organisation.

Staff Awareness & Training
All staff will be made aware of Operation Encompass and their responsibilities for safeguarding children affected by domestic abuse.

Staff will understand:

- The purpose of Operation Encompass.
- The possible impact of domestic abuse on children.
- How trauma may present differently in children with SEND.
- The importance of recognising changes in behaviour and emotional wellbeing.
- The requirement to report concerns to the DSL immediately.
- The importance of confidentiality and secure information handling.

The DSL and Deputy DSL will undertake appropriate Operation Encompass training and maintain their safeguarding knowledge.

Neglect & Physical or Emotional Abuse
Consider unmet basic needs, unsafe supervision, injuries, humiliation, rejection, isolation, threats, stalking or persistent emotional harm. Emotional abuse includes verbal abuse for example persistent criticism, belittling and name calling. Denying the child the space to give their own views and be heard. Report concerns even where the cause is uncertain.

Staff must report concerns based on observations and patterns, not wait for certainty or visible injury. A child may minimise harm, protect a family member or have difficulty describing what is happening. The DSL should consider the cumulative effect, the child's developmental and communication needs and whether siblings or other children may also be at risk.

Neglect may involve persistent failure to meet basic physical or emotional needs, including food, clothing, warmth, supervision, medical care, education or emotional responsiveness. Physical abuse may include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Emotional abuse may involve persistent humiliation, rejection, intimidation, isolation, threats or exposure to harmful interactions including stalking.

Female Genital Mutilation (FGM)
Where a teacher discovers that FGM appears to have been carried out on a girl under 18, the statutory police reporting duty applies. Staff must also report any wider concerns to the DSL and follow current guidance.

Teachers must comply with the statutory duty to report directly to police where they discover

that FGM appears to have been carried out on a girl under 18, in accordance with current law and guidance. This duty does not replace reporting to the DSL or making other safeguarding referrals where required.

FGM is illegal and is a form of abuse. Staff must be alert to disclosures, family pressure, threats, planned travel, sudden absence or information suggesting that a child may be at risk. Do not rely on cultural, religious or family explanations to minimise a concern and do not approach family members where this could increase risk.

Forced Marriage, Honour-Based Abuse & Harmful Practices
Be alert to threats, restrictions, sudden travel plans, family pressure, violence or fear linked to marriage, honour, faith or belief. Do not approach family members if doing so could increase risk.

Staff should report concerns to the DSL promptly. Do not alert family members or arrange a meeting if this could increase risk or expose the child to retaliation. The DSL should follow current specialist guidance and local referral arrangements.

Concerns may include threats, surveillance, restrictions on movement or communication, family pressure, violence, sudden travel plans, withdrawal from education or fear about bringing shame on a family. Forced marriage is distinct from an arranged marriage because free and full consent is absent. A child must not be asked to mediate or negotiate with family members.

Prevent & Radicalisation
Report concerns that a child may be drawn into terrorism or extremist activity to the DSL. The DSL will consider safeguarding support and the appropriate local Prevent referral route. In an emergency call 999.

Staff should report concerns to the DSL, who will assess the context and consider the appropriate local Prevent or Channel pathway. Responses must be proportionate and must not rely on stereotypes or assumptions about a child's religion, ethnicity, identity or political views. Immediate threats or emergencies must be referred to police.

Radicalisation is a safeguarding concern where a child may be drawn towards terrorism or extremist activity. Indicators may include vulnerability to manipulation, sudden changes in views or behaviour, contact with extremist material or individuals, threats, isolation or attempts to recruit others; no single indicator proves radicalisation.

Online Harm & Image Sharing

Concerns may include grooming, coercion, sexual images, threats, cyberbullying, harmful content, blackmail or contact with unsafe adults. Preserve relevant information in line with procedures; do not download, forward or circulate sexual images of children.

The DSL should follow current KCSIE and UK Council for Internet Safety guidance on sharing nudes and semi-nudes, consider immediate safety and coercion or blackmail, support the child, assess whether a crime or exploitation may be involved, and make referrals where appropriate. AI-generated or digitally altered imagery must not be treated as harmless simply because the image is not an authentic photograph.

Where nude or semi-nude images of a child are created, altered, generated by AI, sent or shared, the incident must receive a safeguarding response whether the sharing appears consensual or non-consensual. Staff must not ask a child to forward or show the image, download it, make copies, circulate it or store it in personal devices. Record the information needed to understand the incident without reproducing the image, secure relevant non-image evidence in line with procedure and seek DSL advice immediately.

Online harm may include grooming, coercion, sexual exploitation, cyberbullying, threats, blackmail, harmful content, impersonation, deepfakes, AI-generated sexual images, unwanted contact and sharing of private information. Staff must consider whether an online incident indicates risk offline and whether other children may be affected.

Children Missing Education or Unexplained Absence

Repeated or unexplained absence can indicate abuse, neglect, exploitation or other risk. Follow attendance and children-missing-education procedures, inform the DSL promptly where safeguarding concerns arise and make referrals in line with local requirements.

SCG must maintain accurate attendance information, follow up unexplained absence promptly and share information with the placing school, local authority or other relevant agency in line with the child's placement arrangements. For children attending alternative provision, responsibilities and contact routes must be agreed in writing so that absence is not left unchallenged between organisations.

Repeated, unexplained or prolonged absence, missing episodes, frequent late arrival or sudden disengagement may indicate neglect, exploitation, abuse, mental health difficulties or risks outside the provision. Staff must follow attendance procedures and promptly inform the DSL where absence is unusual, unexplained or connected to other concerns.

Mental Health

Mental health issues and changes in a child's mental health or behaviour may be indicators of abuse or other safeguarding needs. This could show itself as self-harm, suicide ideation, or risk of suicide. Staff should not diagnose; they should report safeguarding concerns promptly and help the child access appropriate support.

Where there is an immediate risk of serious harm, self-harm or suicide, staff must follow emergency and medical procedures such as calling 999 or requesting those with parental responsibility to take the child to A&E. For urgent but non-emergency issues staff can get support from NHS 111 and must always inform the DSL. The child should be listened to without judgement, and information should be shared with appropriate professionals to protect safety.

Mental health difficulties may be an indicator of abuse, neglect, exploitation, bullying, trauma or another safeguarding issue, although they may also arise for other reasons. Staff must not diagnose or assume that distress is solely a mental health issue; they should report safeguarding indicators and ensure that appropriate support is considered.

Staff can refer to the government's mental health guidance ***Promoting Children & Young People's Mental Health and Wellbeing***[5] for more information and support.

Children with a Social Worker, Looked-After Children & Care Leavers

Work with the child's social worker, designated teacher or relevant professional where applicable. Ensure plans are understood by staff who need to know and that changes, missing episodes or new concerns are shared promptly.

Where appropriate and lawful, SCG should work with the child's social worker, designated teacher, virtual school, placing school, carers and other relevant professionals. Plans and contact arrangements should be shared with staff who need to know, and changes in presentation, attendance, relationships or safety must be reported promptly.

Children with a social worker, children in care and care leavers may have additional safeguarding needs and may experience instability, trauma, exploitation or disrupted relationships. Their circumstances must not lead to lower expectations or assumptions about behaviour.

Bullying, Racism, Discrimination & Identity-Based Abuse

Discriminatory language and any derogatory behaviour such as racism, misogyny/misandry, homophobia – including bullying, harassment or exclusion because a child is, or is perceived to be, trans, gender non-conforming or LGBTQ+ -, and biphobia will be challenged, and

treated as prejudice-based abuse. SCG staff should follow SCG behaviour and equality procedures and consider whether the behaviour forms part of a wider pattern of abuse or risk.

Risk assessments and support plans should consider the safety of the child who has been harmed, the child alleged to have caused harm, other children who may be affected and the wider environment. Responses must be proportionate, child-centred, non-discriminatory and informed by specialist advice where required.

The following topics are not exhaustive and must be read alongside current KCSIE and local procedures. Staff should recognise that different forms of harm can overlap, and that children may be reluctant to disclose because of fear, shame, loyalty, threats, coercion or concern about consequences. Staff must report the concern rather than deciding whether it meets a threshold themselves.

Repeated incidents, power imbalance, threats, sexualised or discriminatory behaviour, or an impact on a child's safety may indicate a wider safeguarding concern. The DSL should consider whether the incident is part of a pattern of child-on-child abuse and whether additional support or referral is needed.

Bullying and discriminatory abuse may occur face to face or online and can target disability, race, religion or belief, sex, sexual orientation, gender reassignment, culture, language or other aspects of identity. Staff must challenge harmful language and behaviour, record incidents and follow behaviour and equality procedures.

Links referenced in this section:

[1] Sexual Development & Behaviour in Children | NSPCC Learning – *https://learning.nspcc.org.uk/child-health-development/sexual-behaviour*

[2] Responding to Children Who Display Sexualised Behaviour – *https://learning.nspcc.org.uk/media/2685/responding-to-children-who-display-sexualised-behaviour-guide.pdf*

[3] Modern Slavery: Statutory Guidance for England & Wales (under s49 of the Modern Slavery Act 2015) & Non-Statutory Guidance for Scotland & Northern Ireland – *https://assets.publishing.service.gov.uk/media/6ad09835e5db84746b47960b/Modern_Slavery_Statutory_Guidance.pdf*

[4] Youth Endowment Fund | Research to Prevent Youth Violence – *https://youthendowmentfund.org.uk/*

[5] Promoting Children & Young People's Mental Health & Wellbeing – *https://assets.publishing.service.gov.uk/media/614cc965d3bf7f718518029c/Promoting_children_and_young_people_s_mental_health_and_wellbeing.pdf*

9. ONLINE SAFETY & MOBILE TECHNOLOGY

SCG will take a whole-provision approach to online safety, including filtering and monitoring, staff practice, student education and response to incidents. Online risks may involve content, contact, conduct and commerce.

- Students must receive age- and needs-appropriate teaching about online safety, privacy, respectful communication, harmful content, grooming, image sharing and reporting concerns.
- Staff must use SCG-approved systems and devices appropriately and follow the Staff Code of Conduct and online safety procedures.
- Filtering and monitoring arrangements must be proportionate, effective and regularly reviewed by the responsible senior leader and IT/provider support.
- Concerns identified through monitoring must be assessed and escalated where they may indicate harm or risk to a child.
- Any online incident involving suspected abuse, exploitation, sexual violence or immediate risk must be reported to the DSL without delay.
- Technical cyber-security controls and detailed device rules should sit in the separate IT/ Online Safety policy and be cross-referenced here.

Children must receive teaching adapted to their age, developmental stage and communication needs about privacy, passwords, respectful communication, online relationships, misinformation, scams, harmful content, cyberbullying, grooming, image sharing and reporting concerns. Staff should explain that images can be copied, altered and distributed beyond the sender's control, and that AI-generated images can still cause serious harm.

SCG must identify who is responsible for filtering and monitoring, ensure the systems are appropriate to the setting and risk profile, review their effectiveness at least annually and act on concerns. Filtering and monitoring should not be treated as a substitute for teaching, supervision or professional judgement. Staff must know how to report a blocked or missed item, an alert or a suspected bypass, and how concerns are escalated to the DSL.

Online safety is part of safeguarding across the whole provision and should be reflected in leadership, curriculum, staff training, parent engagement, risk assessment and incident

response. KCSIE describes online risk through four connected areas: content (what a child may see), contact (who may communicate with them), conduct (what they or others do online) and commerce (financial risks such as scams, phishing, gambling or inappropriate advertising).

ARTIFICIAL INTELLIGENCE (AI), ONLINE SAFETY & DIGITAL SAFEGUARDING

Artificial Intelligence (AI), including generative AI tools that can create or manipulate text, images, audio, video and other digital content, is an increasingly significant part of children's and adults' online lives. SCG recognises that AI can offer educational and professional benefits, but also presents safeguarding, privacy, security, ethical and wellbeing risks.

SCG will take a proportionate, risk-based approach to AI use. AI will not replace professional judgement, appropriate supervision, safeguarding procedures or the trusted relationships between staff and students.

AI-Related Safeguarding Risks
AI may create or facilitate safeguarding concerns, **including:**

- exposure to inappropriate, harmful, age-inappropriate, misleading, biased or inaccurate AI-generated content, including misinformation and disinformation presented as fact;
- AI chatbots or systems that simulate relationships or interactions and may be used to manipulate, groom or exploit children, or that encourage inappropriate emotional reliance;
- cyberbullying, harassment, coercion, impersonation and child-on-child abuse facilitated or amplified by AI;
- the creation or sharing of manipulated, synthetic or deepfake images, audio or video of children, staff or others, including AI-generated nude or semi-nude images of children ("deep nudes") and AI-generated pornography or other sexually explicit content;
- radicalisation, extremist content, criminal activity, scams, fraud or other harmful behaviour;
- children disclosing personal, confidential or sensitive information to AI systems;
- AI tools being used to circumvent safeguarding, filtering, monitoring or security controls; and
- children accessing AI tools that have age restrictions or have not been assessed as suitable for educational use.

Any AI-generated or AI-manipulated content that raises concern about the welfare or safety of a child will be treated as a safeguarding concern and reported to the DSL under SCG's usual safeguarding procedures.

Student Use of AI

SCG students do not typically use AI tools as part of the provision. Where SCG permits student use of AI, it will be age-appropriate, educationally purposeful and supervised. **SCG will:**

- check the age restrictions and terms of use of each tool, and only permit students to use tools that SCG has assessed and approved;
- consider filtering and monitoring arrangements where students access AI through SCG devices, systems or networks;
- teach students, in an age- and developmentally-appropriate way, about the benefits and risks of AI, including verifying AI-generated information, not sharing personal, confidential or sensitive information, and recognising manipulation, deepfakes, impersonation, misinformation, online bullying and AI-generated sexual imagery;
- reinforce that creating or sharing harmful or abusive AI-generated content about another person is unacceptable and may be a safeguarding or criminal matter; and
- provide clear routes for students to report concerning AI-generated content, interactions or behaviour to a trusted member of staff.

Students must not use AI to create, manipulate, distribute or request content that is abusive, threatening, discriminatory, sexually explicit, exploitative or otherwise harmful. Where a student's use of AI raises a safeguarding concern, staff must inform the DSL without delay.

Staff Use of AI

Staff may use AI to support legitimate professional activities where the use is appropriate, proportionate and consistent with SCG policies, for example generating ideas, drafting generic resources, summarising non-confidential information, supporting administrative tasks or creative and communications work. Staff remain professionally responsible for all content, decisions and communications produced with AI assistance and must review AI-generated content for accuracy, appropriateness, bias, safeguarding implications and suitability before using or sharing it. AI must not be used as a substitute for professional or safeguarding judgement, specialist advice or human decision-making.

Staff must not enter personal, confidential or sensitive SCG information into publicly available or unapproved AI tools, **including:**

- student names or identifying information, and photographs, videos, voice recordings or other identifiable media of students;
- safeguarding or child protection information, and information about SEND, health, mental health, behaviour, attendance or other vulnerabilities;

- staff and parent/carer personal information;
- passwords, authentication or security details; and
- confidential business information or information held in confidential student, staff or safeguarding records.

Personal or sensitive information may only be processed through an AI system that SCG has specifically approved for that purpose and assessed as appropriate under its data protection and information-security arrangements. Staff must not assume that information entered into an AI service is private or deleted simply because it is removed from the visible conversation, and must consider how the provider collects, stores, uses and retains information.

Approval & Security of AI Tools

SCG will maintain oversight of AI tools used for SCG business or made available to students. **Before a tool is adopted, SCG should consider, where applicable:**

- its purpose, intended users, age restrictions and suitability for children;
- safeguarding, content-safety, filtering and monitoring features, and the potential for manipulation or inappropriate content;
- how personal data is collected, processed, stored, located, secured and deleted, and whether submitted information may be used to train or improve the system;
- account security, multi-factor authentication, user permissions, access controls and integration with SCG systems;
- contractual and supplier assurances, intellectual property and copyright;
- accuracy, bias and reliability; and
- whether a Data Protection Impact Assessment (DPIA) or other data-protection assessment is required.

Only SCG-approved AI tools may be used to process SCG personal, confidential or sensitive information. Staff must not create or use “shadow AI” systems by connecting unapproved AI services to SCG accounts, files, email, student information or other systems. Where an approved tool is connected to SCG systems, access must be restricted by role and legitimate need and protected by appropriate authentication and security controls.

AI-Related Incidents & Safeguarding Concerns

Staff must report any AI-related incident or concern through the appropriate SCG reporting route, **including:**

- a student being targeted through an AI chatbot or AI-generated content, or an AI tool

requesting or obtaining inappropriate personal information from a student;

- AI-generated bullying, harassment or threats, or suspected grooming or exploitation facilitated through AI;
- deepfake or manipulated images, audio or video involving a student or member of staff, including AI-generated nude or semi-nude imagery involving a child;
- a student attempting to access harmful or illegal AI-generated content;
- accidental disclosure of confidential information to an AI system, or suspected compromise of an SCG account or system through an AI-related service; and
- any other use of AI that may create a safeguarding, data-protection or cyber-security risk.

Staff must not investigate, forward, download or redistribute potentially illegal sexual imagery involving children. They should preserve relevant information where appropriate and report concerns immediately to the DSL/DDSL. AI-related concerns will be considered under SCG's existing child protection, child-on-child abuse, online safety, behaviour, data protection and incident-reporting procedures as appropriate.

The 4Cs & AI

SCG's approach to online safety is based on the four categories of risk identified in KCSIE 2026: **Content, Contact, Conduct and Commerce**. These risks may be facilitated, amplified or created through AI and generative AI technologies.

4C	AI Example for SCG
Content	AI-generated pornography, extremist material, misinformation, deepfakes
Contact	AI chatbots simulating relationships, manipulation, grooming or exploitation
Conduct	AI bullying, impersonation, deepfake images, AI-generated nudes
Commerce	AI-enabled scams, phishing, fraud and manipulation

AI Awareness, Training & Review

SCG will ensure that staff receive appropriate information and training on the benefits and limitations of AI; safeguarding risks, including deepfakes, AI-generated sexual imagery, misinformation and manipulation; data-protection and confidentiality risks; safe use of AI tools and checking AI-generated information; age restrictions and suitability of tools; how AI interacts with filtering and monitoring; and how to report AI-related safeguarding,

data-protection or security concerns. This will form part of SCG's wider online-safety and safeguarding training.

SCG will review its approach to AI at least annually as part of its online-safety and safeguarding review, considering emerging technologies and risks, changes to age restrictions and terms of service, incidents and concerns, staff and student feedback, filtering and monitoring arrangements, data-protection requirements and relevant Department for Education, National Cyber Security Centre and Information Commissioner's Office guidance. Staff must follow the SCG Artificial Intelligence (AI) Use, Safety & Security Framework, which provides further guidance on the safe, responsible and secure use of AI at SCG.

For further information and guidance on AI read: *Generative Artificial Intelligence in Education*[1].

Links Referenced in this Section:

[1] Generative Artificial Intelligence in Education – *www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education.*

10. ALLEGATIONS & CONCERNS ABOUT ADULTS

10.1 ALLEGATIONS MEETING THE HARM THRESHOLD

Any allegation that an adult who works with children has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved in a way that may indicate they are unsuitable to work with children must be reported immediately to the designated case manager.

The case manager will follow KCSIE and local LADO procedures, seek advice promptly and avoid conducting an internal investigation before agreeing the appropriate course of action

with the relevant agencies. If the allegation concerns the DSL or Director, it must be reported to the alternative senior person identified by SCG's governance arrangements. If it concerns the most senior person, use the appropriate external route.

Information must be shared on a need-to-know basis, while ensuring that the child and any witnesses are protected from pressure or retaliation. The organisation must follow current guidance on confidentiality, support for those involved, records, outcomes and any required referral to the DBS or professional regulator.

The case manager must contact the LADO in line with local procedures and seek advice before taking action that could prejudice enquiries. Police and children's social care may need to be involved. Any decision about suspension, alternative duties or other interim measures must be risk-assessed and must not be automatic or used as a substitute for proper consideration.

An allegation must be considered against the current KCSIE harm threshold, including whether an adult may have harmed a child, committed a criminal offence against or related to a child, behaved towards a child in a way that indicates a risk of harm, or behaved in a way that may indicate they are unsuitable to work with children. An allegation may relate to conduct outside work as well as conduct in the provision.

10.2 LOW-LEVEL CONCERNS

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the Staff Code of Conduct or professional expectations, even if it does not meet the harm threshold. It may relate to boundaries, favouritism, communication, gifts, private contact, inappropriate comments or other conduct.

- All staff must report low-level concerns promptly to the DSL or designated alternative.
- The DSL/appropriate leader must record the concern, context, advice sought, action taken and rationale for decisions.
- Patterns must be reviewed to identify possible escalation or wider practice concerns.
- Concerns about the DSL must be reported to the Director or other named alternative; concerns about senior leaders must follow the alternative reporting route.
- Low-level concerns must be handled sensitively and fairly, without discouraging reporting.

Staff must be able to report concerns without fear of unfair treatment. Concerns about the DSL or senior leaders must be raised with the named alternative. SCG should review trends

and use learning to strengthen boundaries, training and supervision.

All low-level concerns must be reported and recorded so that patterns can be identified. The person receiving the concern should document the facts, context, advice, action and rationale, and consider whether the concern is actually more serious or forms part of a pattern that changes the assessment. A low-level label must not be used to avoid a LADO consultation where the threshold may be met.

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the Staff Code of Conduct or professional expectations, even where the harm threshold is not met. Examples may include favouritism, over-familiarity, inappropriate communications, boundary crossings, private contact, unnecessary gifts or failure to follow procedures.

10.3 WHISTLEBLOWING & REFERRALS

Staff who are concerned about unsafe practice or believe that a safeguarding concern is being ignored must escalate it through SCG's whistleblowing arrangements or to the appropriate external agency. Where referral to the Disclosure and Barring Service (DBS), Teaching Regulation Agency or another regulator is required, SCG will comply with current statutory requirements.

Staff must not investigate allegations themselves, promise confidentiality or discuss the matter with colleagues who do not need to know. Records should capture the concern, advice sought, decisions and rationale, and action taken. The appropriate external route must be used where the allegation concerns the DSL, Director or another senior person.

All concerns about adults working with children must be handled promptly, fairly, consistently and confidentially, with the child's safety as the priority. The distinction between a concern meeting the harm threshold and a low-level concern must be assessed using current KCSIE, not used to dismiss or downgrade an uncomfortable concern.

Where the facts meet the legal criteria for referral to the Disclosure and Barring Service or another professional regulator, the organisation must make the required referral and retain a record of the decision and supporting information. Advice should be sought where needed, but a legal reporting duty must not be overlooked.

Staff who believe that unsafe practice is occurring, that a concern has been ignored or that a senior person is involved must use the alternative reporting route or whistleblowing

procedure. If internal routes are inappropriate or ineffective, staff may contact the relevant external safeguarding agency directly.

11. SAFER RECRUITMENT & SUITABILITY

SCG will maintain safer recruitment and ongoing suitability arrangements in accordance with current law, KCSIE and relevant DBS guidance. Detailed operational steps are set out in SCG's Safer Recruitment Procedure.

- Recruitment processes must include appropriate identity, right-to-work, qualification, employment-history, reference and criminal-record checks, as applicable to the role.
- The required checks must be completed and recorded before a person starts regulated activity, unless a lawful and properly risk-assessed exception applies.
- At least one person involved in interviewing must have completed appropriate safer recruitment training, in accordance with current requirements.
- The single central record must be maintained where required and audited regularly.
- Agency, supply, contractor and volunteer arrangements must include appropriate checks and clear responsibility for verifying them.
- Induction must cover safeguarding, professional boundaries, reporting routes, the Staff Code of Conduct and this policy.
- Any concern arising during recruitment or employment must be assessed and acted on promptly.

SCG must confirm that the detailed recruitment procedure and single central record arrangements reflect the requirements in force at the date of approval.

Recruitment and induction must assess suitability, safeguarding attitudes and professional boundaries. Staff must understand that suitability is monitored throughout employment, including through supervision, conduct concerns, low-level concern reporting and action following allegations. The safer recruitment procedure and single central record must be checked against the KCSIE requirements in force at approval.

Required checks must be completed before a person undertakes work or activity for which

the checks are required, and any permitted exception must be lawful, authorised, risk-assessed and appropriately supervised. Responsibility for checks must be clear when using supply agencies, contractors or commissioned providers. SCG must verify and record checks in the single central record where required, audit records regularly and correct gaps promptly.

Safer recruitment is a continuing safeguarding process, not just a check at appointment. SCG must follow current KCSIE, legislation and DBS requirements for the setting and role, including identity, references, employment history, right to work, qualifications where relevant, barred-list and criminal-record checks, prohibition or other checks where applicable, and checks for volunteers, agency staff, contractors and visitors.

12. CHILDREN WHO MAY NEED ADDITIONAL SUPPORT

CHILDREN WITH SEND, DISABILITIES OR HEALTH NEEDS

Consider communication adjustments, dependence on adults, barriers to disclosure and the possibility that behaviour or distress may signal harm. Ensure reasonable adjustments and accessible reporting routes are available.

Use accessible communication and reporting methods, allow additional time, check understanding and involve appropriate specialists where needed. The child's disability or support needs must never be used as a reason to discount an allegation or delay a referral.

Children with SEND or disabilities may face increased risks because of communication barriers, dependence on adults, social isolation, difficulty recognising unsafe behaviour or assumptions that distress is part of their condition. Staff must be alert to changes from the child's usual presentation and must not interpret all behaviour through a diagnosis.

YOUNG CARERS

Be alert to the impact of caring responsibilities on attendance, wellbeing, safety and

development. Consider early help and appropriate support.

Concerns should be discussed with the DSL and relevant support services. Staff must not assume that a child's caring role is voluntary or safe, and must consider whether the child or another person in the household may be at risk.

Young carers may experience fatigue, stress, absence, isolation, financial hardship or responsibilities that affect their education and safety. Staff should sensitively establish whether the child has appropriate support and whether caring responsibilities are affecting health, development or attendance.

CHILDREN WITH A SOCIAL WORKER OR SUBJECT TO PLANS

Where relevant, contribute to multi-agency planning and share changes in attendance, presentation, behaviour or safety with the child's social worker and DSL.

Staff should contribute accurate observations to reviews and plans when requested, and must not assume that existing professional involvement means new concerns do not need to be reported.

Where a child is subject to a child protection plan, child-in-need plan or other statutory arrangement, staff must know the information necessary to keep the child safe and the agreed role of SCG. Information should be shared promptly with the DSL and the relevant social worker where concerns, absences or significant changes occur.

LOOKED-AFTER & PREVIOUSLY LOOKED-AFTER CHILDREN

Recognise that care experience may create specific safeguarding needs. Work with the designated teacher, social worker, virtual school or other relevant professionals where applicable.

Where applicable, SCG should liaise with the designated teacher, social worker, virtual school and carers, following the child's care or education plan and sharing information securely. Changes in placement, contact arrangements, attendance or behaviour should be considered in context and reported when they raise concern.

Children in care and previously looked-after children may have experienced trauma, disrupted attachments, instability or exploitation. Staff should promote a stable, predictable and

supportive environment while maintaining appropriate safeguarding vigilance.

CHILDREN FACING DISCRIMINATION OR IDENTITY-BASED HARM

Respond to bullying, harassment, exclusion and abuse linked to disability, race, religion, sex, sexual orientation, gender reassignment or other protected characteristics in line with law and current guidance.

Support must be tailored to the child, accessible and coordinated with relevant professionals. Staff should consider the child's views, communication needs, trusted relationships, risks in different settings and whether adjustments are required to enable safe participation and disclosure.

Some children face additional barriers to recognising, communicating or reporting abuse, or may be more exposed to particular forms of harm. Additional vulnerability does not mean that abuse is inevitable, and staff must avoid assumptions that a child's needs explain away a safeguarding concern.

Record incidents, consider patterns and power imbalances, follow behaviour and equality procedures, and refer to the DSL where the behaviour may amount to abuse or indicate risk. Ensure the child can access support without being pressured to disclose more than they wish.

Children may experience targeted abuse, harassment or exclusion linked to disability, race, religion or belief, sex, sexual orientation, gender reassignment or other aspects of identity. Staff must respond to the harm, not treat discriminatory language as harmless joking or require the child to educate others about the impact.

13. PARENTS & CARERS

SCG will work in partnership with parents and carers where it is safe and appropriate to do so. The DSL will normally consider how and when parents/carers should be informed about a concern or referral.

Parents/carers must not be informed before referral where doing so could increase risk to the child, compromise a police or social care investigation, expose a child to further harm or otherwise be contrary to professional advice. The DSL should seek advice from children's

social care or police where uncertain and record the rationale for decisions.

Parents and carers should be signposted to the relevant policy and online safety information, including guidance on AI and image sharing where appropriate. Engagement with families must not delay protective action or lead staff to promise an outcome that cannot be guaranteed.

Where a referral is necessary, parents or carers should normally be informed unless doing so could place the child at greater risk, compromise an investigation, lead to intimidation or destruction of evidence, or conflict with advice from children's social care or police. Reasons for not informing them should be recorded.

SCG will work with parents and carers openly and respectfully where it is safe and appropriate, while recognising that a parent or carer may be implicated in the concern or that informing them may increase risk. The DSL must decide when and how to communicate, taking account of the child's wishes, age and understanding, professional advice and any ongoing investigation.

14. RECORD KEEPING

Safeguarding records must be accurate, factual, timely, securely stored and access-controlled. Records must be kept separately from general educational records where SCG's records procedure requires this.

- Record the child's details, date/time, source of information, facts observed and the child's own words where relevant.
- Record actions taken, referrals or advice sought, decisions made, the rationale for decisions, people informed and outcomes.
- Distinguish facts from opinion and clearly attribute information to its source.
- Do not alter or destroy an original record; corrections or additions must be dated and attributable.
- Share and transfer safeguarding records securely and promptly when required, following current guidance and SCG procedures.
- Follow SCG retention, access, data protection and breach-reporting arrangements.

SCG's detailed concern form, chronology template, student profile and contact/action record

should be maintained as separate operational forms so that this policy remains concise and can be updated without reproducing forms.

Safeguarding records must be stored securely with access restricted to those who need them. Transfers to another school, provision or agency must be timely, secure and acknowledged where appropriate. Records must be retained and disposed of under current legal and organisational requirements; no record should be altered or destroyed outside the authorised process.

Record the child's own words where relevant, factual observations, the source of information, relevant context, immediate actions, consultations, referrals, decisions and follow-up. Clearly distinguish fact, the child's account, third-party information and professional opinion. Do not include speculation, judgemental language or unnecessary personal information.

Good safeguarding records create a clear chronology and allow professionals to understand what happened, what was known at the time, what decisions were made and why. Records must be made as soon as possible, dated, attributable to the author and sufficiently detailed for another professional to understand the concern without relying on memory.

15. TRAINING & INDUCTION

All staff, including temporary staff, volunteers and relevant contractors, must receive safeguarding induction before or at the start of their work and regular updates thereafter. All staff must read KCSIE 2026 Part One in full and confirm that they have done so.

Staff induction and safeguarding updates will explain the purpose of Operation Encompass, the possible impact of domestic abuse on children, confidentiality and secure information handling, accessible support for children with SEND, and the requirement not to question or pressure a child about a notified incident. The DSL and authorised deputies will receive appropriate role-specific training and updates on applicable local notification arrangements.

Training must cover recognising abuse and neglect, responding to disclosures, reporting and recording concerns, online safety, child-on-child abuse, professional boundaries, information sharing, whistleblowing and local referral arrangements. Training should be refreshed at intervals appropriate to role, risk and current guidance.

The DSL and DDSLs must receive role-specific and multi-agency training, refresh their knowledge regularly and maintain awareness of local safeguarding partnership procedures. SCG must keep records of training and policy acknowledgements.

The DSL and deputies must receive appropriate role-specific training and regular updates, including local multi-agency arrangements, referrals, information sharing, child protection records, online safety, allegations and support for children who have experienced harm. Staff should have opportunities to ask questions and confirm how procedures apply to SCG's alternative provision context.

Training must cover recognising abuse and exploitation, listening to disclosures, reporting and recording, child-on-child abuse, sexual harassment and violence, online safety and AI-related risks, information sharing, professional boundaries, low-level concerns, allegations, whistleblowing, attendance and local referral thresholds. Training should be adapted to the responsibilities and needs of different roles.

All staff must receive safeguarding induction before or at the start of their work and regular updates at least annually, with additional updates when guidance or local procedures change. Staff who work directly with children must read Part One of the current KCSIE; staff who do not work directly with children must receive the information specified by current KCSIE. SCG must record completion and ensure staff understand rather than merely acknowledge the documents.

16. MONITORING, REVIEW & GOVERNANCE

The policy owner and DSL will review this policy at least annually and sooner following material changes in legislation, statutory guidance, local safeguarding arrangements, SCG provision or learning from an incident.

Monitoring may include review of concern records, timeliness of referrals, attendance and missing-education concerns, training completion, low-level concern patterns, safer recruitment checks, online filtering and monitoring, student voice, complaints and actions arising from audits or reviews.

The relevant governance body will receive safeguarding assurance at appropriate intervals.

Monitoring should focus on whether arrangements are effective and improve outcomes, not solely whether procedures exist.

Senior leaders and governance should receive safeguarding assurance at appropriate intervals, including unresolved risks, trends, actions taken and areas for improvement. The review must confirm that local contacts, named role holders, alternative provision arrangements, referral thresholds and linked policies remain accurate.

The policy must be reviewed at least annually and sooner if KCSIE or other statutory guidance changes, SCG's legal status or provision changes, a serious incident occurs, local safeguarding procedures change or an audit identifies a weakness. Updates must be communicated to staff and reflected in induction and training.

Monitoring should test whether safeguarding procedures are effective in practice. This may include audits of concern records and chronologies, referral timeliness and outcomes, attendance and missing episodes, low-level concern patterns, staff training, recruitment records, filtering and monitoring, student feedback, complaints and learning from incidents.

17. COMPLAINTS & WHISTLEBLOWING

Concerns about the application of this policy should be raised with the DSL or senior leader. Complaints will be handled under SCG's Complaints Policy, while safeguarding concerns must be acted on immediately and must not wait for the complaints process.

Any member of staff who believes a child may be at risk must use the safeguarding reporting route even if a complaint is also being considered. Staff may use SCG's whistleblowing procedure or appropriate external routes if they cannot raise a concern internally or believe it has not been addressed.

Staff must be able to raise concerns about unsafe practice, poor safeguarding decisions or a failure to act. Where a concern involves the DSL or a senior leader, the alternative route must be used. If internal processes are not safe or effective, staff may contact the relevant local authority safeguarding service, LADO, police or other appropriate agency.

Complaints about service quality or the application of this policy should follow SCG's

Complaints Policy, but a safeguarding concern must be acted on immediately and must not wait for a complaint to be investigated. Where a complaint includes a concern that a child is at risk, staff must use the safeguarding reporting route as well.

18. LINKS WITH OTHER POLICIES

This policy should be read alongside the current versions of:

- Staff Conduct Policy
- Safer Recruitment Policy
- Internet & Email Usage Policy
- AI Framework
- Social Media, Digital Safeguarding & Media Use Policy
- Behaviour Policy
- Attendance & Children Missing Education Procedures
- Complaints Policy
- Data Protection Policy
- SEND Policy
- Health & Safety Policy

Particular attention must be given to the Internet & Email Usage Policy, Staff Conduct Policy, Safer Recruitment Policy, our Attendance & Children Missing Education procedures, Data Protection Policy, Behaviour Policy, SEND Policy, and our AI Framework. AI use, image-sharing incidents and filtering and monitoring responsibilities should be covered clearly in the relevant linked documents.

This policy must be applied alongside the listed policies and procedures. If a related policy conflicts with a safeguarding action needed to protect a child, staff must seek immediate advice from the DSL and follow statutory guidance and local safeguarding procedures. Cross-referenced documents must be current, accessible and consistent with this policy.

APPENDIX 1: TYPES OF ABUSE & INDICATORS

Types of Abuse Categories (Quick Reference Only)
These definitions are non-exhaustive and do not replace training or statutory guidance.

PHYSICAL ABUSE	May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Indicators can include unexplained injuries, inconsistent explanations, fear of going home or flinching, but indicators must be considered in context. Possible indicators include unexplained injuries, injuries with an implausible explanation, repeated injuries, fear of going home or of a particular person, flinching, or inconsistent accounts. The absence of an injury does not rule out physical abuse. Staff should record visible observations objectively and must not examine a child beyond their role or ask leading questions.
EMOTIONAL ABUSE	Persistent emotional maltreatment that may cause severe and adverse effects on emotional development. It can include humiliation, rejection, threats, isolation, intimidation, coercion or exposure to frightening experiences. Possible indicators include persistent fear, withdrawal, low self-esteem, extreme compliance, aggression, developmental regression, humiliation, rejection, threats, isolation or exposure to frightening interactions. Consider whether the behaviour is repeated, whether there is a power imbalance and how it affects the child's development and emotional security.
SEXUAL ABUSE	Children are likely to know their abuser. Forcing, enticing or causing a child to take part in sexual activities (violence does not have to be present), whether or not the child understands what is happening constitutes sexual abuse. It may involve contact (penetration by a another's body or object) or non-contact acts (masturbation, rubbing, touching when clothed or kissing for example). Exploitation, grooming, image-based abuse or online activity is included. Children under the age of 13 can never give consent to any

SEXUAL ABUSE	Additionally, sexual abuse may include involving children in the production of or looking at sexual images, watching sexual activities and encouraging sexualised behaviours; grooming a child in preparation for sexual abuse to take place. Women and children can also commit acts of sexual abuse. Sexual abuse can occur within an institution, in the community and within the family. Children under the age of 13 can never give consent to any sexual activity, under the ***Sexual Offences Act 2003: Rape & Other Offences Against Children Under 13***[1]. There are also offences that specifically relate to children under the age of 16 irrespective of whether they have or have not agreed to a sexual activity, under the ***Sexual Offences Act 2003: Child Sex Offences***[2]. Sexual images may be photographed, altered or wholly generated by AI. All concerns about nude or semi-nude images involving children require a safeguarding response, and staff must not request, copy, forward or circulate such images. Possible indicators include disclosures, sexual knowledge or behaviour that is not developmentally expected, distress linked to a person or place, pregnancy or sexually transmitted infections, coercive relationships, or online requests for images. Indicators are not proof, and a child may not show any outward signs. Respond calmly, avoid investigation and refer immediately.
NEGLECT	Persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development. It may involve food, clothing, shelter, supervision, vlcare, education or emotional responsiveness. Possible indicators include persistent hunger, inadequate clothing, poor hygiene, untreated health needs, unsafe supervision, tiredness, poor attendance, lack of response to emotional needs or a child taking on responsibilities beyond their age. Consider frequency, severity, context and the cumulative impact on health, safety and development.

EXPLOITATION	Children may be manipulated, coerced or groomed for sexual, criminal or other purposes. Apparent agreement or participation does not mean a child is not being exploited. Other forms of harm include domestic abuse, child-on-child abuse, sexual harassment and violence, online abuse, bullying, discriminatory abuse, radicalisation, trafficking, modern slavery, forced marriage, FGM and abuse linked to honour, faith or belief. Abuse may be perpetrated by adults or other children, occur online or offline, and overlap with exploitation, domestic abuse, discriminatory harm or mental health needs. Where there is uncertainty, consult the DSL promptly. The indicators below are examples and are not a checklist or a diagnostic tool. Some children will show no obvious signs, while indicators may have explanations other than abuse. Staff must consider the whole context, cumulative patterns and the child's own account, and refer concerns rather than attempting to establish proof. Possible indicators include grooming, unexplained gifts or money, debt, coercion, threats, missing episodes, association with unsafe adults or peers, being asked to carry items, sexual activity linked to exchange, or sudden changes in behaviour or attendance. Children may not see themselves as victims and may be fearful of the consequences of disclosure.

Links referenced in this section:

[1] Sexual Offences Act 2003 (Rape and other offences against children under 13) – *www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/rape-and-other-offences-against-children-under-13*

[2] Sexual Offences Act 2003 (Child sex offences) – *www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/child-sex-offences*

APPENDIX 2: IMMEDIATE RESPONSE & REPORTING PATHWAY

Step-by-Step: Response & Reporting Pathway

1. Concern, disclosure, observation or information received.
2. If there is immediate danger or a crime in progress: **call 999**.
3. Listen, reassure, do NOT investigate, do NOT promise secrecy.
4. Report to the DSL immediately; if unavailable, contact a DDSL or named alternative.
5. Make a clear, factual written record as soon as possible using the current SCG form.
6. DSL assesses risk, consults local procedures and makes referral/contacts, as required.
7. Record decisions, rationale, actions, people informed and outcomes.

If the concern is not acted on or risk remains, escalate to senior leadership or contact children's social care/police directly.

The DSL will assess the concern, decide whether immediate protective action and external referral are required, record the rationale, and ensure follow-up. If there is no response or the concern is not resolved, escalate through local procedures. If the concern is about the DSL, use the alternative route. Staff must not investigate, promise secrecy or assume another person has reported.

Where a child is in immediate danger or requires urgent medical attention, contact emergency services as appropriate and inform the DSL as soon as possible. For all other concerns, report immediately to the DSL or DDSL and complete the required factual record promptly.

APPENDIX 3: LOCAL SAFEGUARDING CONTACTS

LOCAL SAFEGUARDING CONTACT SHEET

AREA	SERVICE / ROLE	PHONE	EMAIL / NOTES
SCG	DSL - **Emma Marshall**		emma@sportingchances.org
SCG	DDSL - **Ellie Paskin**		ellie@sportingchances.org
SCG	Alternative contact (if concern involves DSL/ Director)	**Diana Wilson** 07940 129205	diana@sportingchances.org
SCG	Director - **David Johnson**	07791 262122	david@sportingchances.org
Surrey	Children's Single Point of Access (C-SPA)	0300 470 9100	cspa@surreycc.gov.uk
Surrey	Emergency Duty Team (evenings/weekends/bank holidays)	01483 517898	edt.ssd@surreycc.gov.uk
Surrey	Local Authority Designated Officer (LADO)	0300 123 1650	lado@surreycc.gov.uk
Sutton	Children's First Contact Service (CFCS)	020 8770 6001	childrensfirstcontact@ sutton.gov.uk
Sutton	Local Authority Designated Officer (LADO)	020 8770 4776	LADO@sutton.gov.uk
Sutton	Sutton Local Safeguarding Children Partnership	020 8770 4879	suttonlscp@sutton.gov.uk; www.suttonlscp.org.uk
National	Police	999 (emergency) / 101 (non-emergency)	Use current police guidance
National	NSPCC Helpline	0808 800 5000	www.nspcc.org.uk
National	NSPCC Whistleblowing Advice Line	0800 028 0285	For staff who CANNOT raise concerns internally
National	Childline	0800 1111	www.childline.org.uk

APPENDIX 4: APPROVAL & ANNUAL REVIEW CHECKLIST

APPROVAL & ANNUAL REVIEW CHECKLIST

Organisation & Governance

- Confirm the organisation's full legal name, provision types, age range and governance body.
- Confirm alternative provision responsibilities, attendance arrangements, site locations and commissioned-placement arrangements, where applicable.

Safeguarding Contacts & Reporting

- Insert and verify names and contact details for the DSL, DDSLs, Director/case manager and alternative reporting routes.
- Verify all relevant local authority, children's social care, LADO, Prevent and out-of-hours contacts.
- Confirm that staff and children have clear, accessible routes to raise concerns safely, including concerns about adults and low-level concerns.

Legislation, Guidance & Procedures

- Check the policy against KCSIE 2026, Working Together 2026 and current local safeguarding partnership procedures.
- Check safer recruitment, DBS checks, the Single Central Record (SCR) and referral arrangements against current requirements.
- Confirm that child-on-child abuse and harmful sexual behaviour procedures reflect current KCSIE requirements.
- Confirm that information-sharing, record-keeping, chronology and escalation procedures are clear and workable.
- Confirm links to current SCG concern forms, chronologies, student profiles and staff conduct procedures.

Online Safety & Artificial Intelligence

- Confirm online safety arrangements cover content, contact, conduct and commerce.
- Confirm online filtering and monitoring ownership, escalation, responsibilities and annual review arrangements.
- Confirm that generative AI use, AI-generated sexual imagery and associated safeguarding risks are addressed.
- Confirm that SCG's AI use, safety and security arrangements and the SCG Artificial Intelligence (AI) Use, Safety & Security Framework have been reviewed, approved, communicated to staff and remain current.

Staff Training & Safeguarding Awareness

- Confirm safeguarding training, induction, refresher requirements and read-and-understood acknowledgements are current.
- Confirm staff understand their safeguarding responsibilities, reporting routes and relevant procedures.
- Confirm policy review responsibilities and arrangements for communicating updates to staff.

Operation Encompass

- Confirm SCG's Operation Encompass arrangements, including the applicable police notification route, trained recipients and deputy cover, secure access, local timescales, commissioned-placement information-sharing protocol, record ownership, escalation arrangements and staff training.

Approval, Publication & Review

- Obtain formal approval from the appropriate governance body or authorised approver.
- Record the approver, approval date, next review date and any outstanding actions.
- Publish the approved version and withdraw superseded copies.