

## Safeguarding ALFA Education Policy 2025/26

<b>Policy Number</b>	ED/POL/002	<b>Author/Reviewer</b>	Martin Keightley
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### 1. Supporting Documents

- Behaviour and Anti-Bullying Policy
- Risk Assessment Policy
- First Aid Policy
- Attendance Policy
- Whistleblowing Policy
- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children
- SEND Code of Practice

### 2. Details

<b>Name of provision</b>	<b>Alternative Learning for All (ALFA)</b>
<b>Headteacher</b>	<b>Mitchell Rose</b>
<b>Designated Safeguarding Lead</b>	<b>Mitchell Rose</b>
<b>Deputy Designated Safeguarding Lead(s)</b>	<b>Asa Cresey</b>
<b>Chair of Governors</b>	James Madine
<b>Safeguarding Director</b>	Julie Hamilton
<b>Safeguarding Quality Assurance Manager</b>	Martin Keightley

### **3. Aims**

This Safeguarding Policy has been developed in strict accordance with the statutory guidance outlined in Keeping Children Safe in Education (KCSIE) 2025 to safeguard and promoting the welfare of children under 18. It also aligns with the multi-agency framework established by Working Together to Safeguard Children, ensuring effective collaboration among all safeguarding partners. This framework sets out clear expectations for safeguarding arrangements, staff training, and leadership oversight. Although ALFA is not a school, the Headteacher follows the guidance set out in KCSIE 2025 to keep learners safe.

This Safeguarding Policy will be regularly reviewed and updated to reflect the latest statutory guidance and best practices. We will incorporate technical changes from the Keeping Children Safe in Education 2025 guidance to improve the clarity and effectiveness of our safeguarding practices. This includes updating terminology, procedures, and training materials to ensure that our policy remains comprehensive and effective.

Our commitment to inclusivity is embedded throughout this policy, with a focus on recognising and addressing the needs of children with Special Educational Needs (SEN). For example, staff receive annual training on recognising signs of abuse in children with SEN, and our safeguarding team conducts regular reviews to ensure all procedures are adapted to meet the diverse needs of every child.

To maintain robust and up-to-date practices, we continually review and revise our policies in line with new statutory requirements or emerging guidance, referencing additional documents and updates as they become available. This ongoing process reassures stakeholders that our safeguarding approach remains thorough, compliant, and responsive to the evolving landscape of child protection. We will implement practices and policies that promote mental health and emotional wellbeing, ensuring that children have access to the support they need to thrive in their educational environment.

### **4. Definitions**

Safeguarding and promoting the welfare of children involves:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring children grow up in conditions that support safe and effective care.

Child protection is included within this definition and refers to measures taken to prevent children from experiencing, or being at risk of experiencing, significant harm.

Abuse is defined as any form of maltreatment of a child, which may include causing harm or failing to act to prevent harm. This encompasses sexual, physical, and emotional abuse, all of which can occur either in person or online.

Neglect is classified as a type of abuse involving the continued failure to meet a child's basic physical and/or psychological needs, potentially resulting in serious impairment of health or development.

The sharing of nudes and semi-nudes (also referred to as sexting or youth-produced sexual imagery) is when children share nude or semi-nude images, videos, or live streams.

ALFA recognises the importance of addressing group-based child sexual exploitation and abuse. We will incorporate emerging learnings from the National Audit on Group-based Child Sexual Exploitation and Abuse into our safeguarding practices. Staff will be trained to identify and respond to signs of exploitation and abuse, ensuring that children are protected and supported.

Children are defined as individuals under the age of 18.

Contextual safeguarding acknowledges that children can encounter risks in various settings, including schools, residential homes, neighbourhoods, online platform and with peers. There is a duty to address risks in broader environments, such as radicalisation, exploitation, youth violence, gangs, digital or AI-related concerns, inappropriate relationships, and unsafe community spaces. Contextual safeguarding risk assessments (referenced in Appendix 7) should be reviewed termly by the DSL and reported to governors.

Safeguarding partners are designated in Keeping Children Safe in Education 2025 (further defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). These partners collaborate to safeguard and promote local children's welfare, including identifying and addressing their requirements. Partners include:

- The local authority (LA)
- Integrated care boards within the LA area
- The chief officer of police for a police area within the LA

"Victim" is a commonly used term; however, it is recognised that not all individuals affected by abuse identify with this description. During incident management, terminology will be selected according to the preferences of the child involved.

"Alleged/perpetrator(s)" are standard terms, but abusive behaviour may also impact the individual responsible, particularly if they are a child. Care will be taken to use language that does not stigmatise or shame. Alternative terms include "person alleged to have caused harm" or "the individual involved". Terminology will be decided on a case-by-case basis.

## 5. Roles and Responsibilities

Safeguarding and child protection are collective responsibilities. This policy is applicable to all staff, volunteers, and governors within ALFA and aligns with procedures set forth by the three safeguarding partners. It is our duty to ensure that ALFA upholds robust and appropriate safeguarding measures, at all times.

### All staff are required to:

- Read and understand *Keeping Children Safe in Education* (KCSIE) Part 1 and Annex B, review it annually, and affirm their understanding via a signed declaration each academic year.
- Reinforce online safety when communicating with parents/carers, including guidance on children's online activities.
- Provide safe spaces for LGBTQ+ learners to express concerns.

### All staff will also be aware of and utilise:

- ALFA's safeguarding infrastructure (this policy, behaviour policy, online safety policy, CPOMS, DSL/deputies).
- Their role in early intervention (identifying emerging concerns, liaising with the DSL, and sharing pertinent information).
- Procedures for referring cases to children's social care and statutory assessments, and their potential involvement in these processes.
- Appropriate responses to child disclosures of abuse or neglect, including FGM, maintaining confidentiality, and collaborating with professionals.
- Indicators of abuse or neglect and specific issues such as peer-on-peer abuse, CSE, CCE, serious violence/county lines, radicalisation, and FGM.
- The importance of reassuring children that their concerns are taken seriously and support will be provided.
- Recognition that risks may arise both inside and outside the home, or online.
- Awareness that LGBTQ+ children, or those perceived as such, may experience additional risks.
- Understanding that children with SEN are at greater risk and may face further vulnerabilities compared to their peers without SEN.

### Designated Safeguarding Lead (DSL)

The DSL (Mitchell Rose), a senior leader, holds primary responsibility for child protection and safeguarding, including online safety and filtering/monitoring.

### DSL

- Keep senior leadership informed.
- Liaise with the local authority, LADO, police, and safeguarding partners.
- Maintain awareness of local specialist support available for victims and alleged perpetrators.

- Ensure the presence of an “appropriate adult” during police involvement with learners.

## **Headteacher Responsibilities**

The Headteacher is accountable for:

- Inducting all staff and volunteers (including temporary personnel) into ALFA’s safeguarding systems and procedures and ensuring adherence to referral processes.
- Acting as the “case manager” for allegations concerning staff or volunteers.
- Making determinations on low-level concerns (consulting the DSL as appropriate).
- Communicating this policy to parents/carers and ensuring publication on the ALFA website.

## **Governing Board Responsibilities**

The Governors shall:

- Implement a whole-service approach to safeguarding, integrating it across all policies and processes.
- Approve and annually review this policy, ensuring compliance, and hold the Headteacher accountable.
- Fulfil duties pertaining to the **Human Rights Act 1998**, **Equality Act 2010**, and local safeguarding arrangements.
- Appoint a senior board-level lead (Julie Hamilton, Group Safeguarding Director) independent of the DSL, to oversee the efficacy of safeguarding policies.
- Ensure mandatory safeguarding/child protection training for all staff, inclusive of online safety, with regular updates.
- Oversee the implementation of suitable filtering and monitoring systems, ensuring comprehension among staff and alignment with DfE standards.
- Grant the DSL the requisite authority, resources, and time necessary to execute their role.
- Ensure processes are established for managing low-level concerns and compliance with these procedures (see section 5).

## **Contextual Risk Assessment**

Contextual Risk Assessments identify risks to learners beyond the home, including within the local community when delivering offsite site in public areas. These assessments must be completed at the beginning of the Academic Year in accordance with KCSIE updates and reviewed at the start of each term by the DSL and Leadership Team. Reviews will be minuted, and outcomes communicated to staff as appropriate. Governors will review the updated assessments each term.

## **Oversight and Quality Assurance**

Governors, the Education Director, and the Keys Safeguarding Compliance Team have explicit oversight functions, including regular analysis of safeguarding data, termly reviews of contextual safeguarding risk assessments, and clear escalation procedures in instances where risks or deficiencies are identified.

## **Preventative Education Responsibilities**

ALFA plays an integral part in preventative education, adopting an approach to equip learners with the knowledge and skills necessary for life in contemporary Britain. A zero-tolerance culture towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment underpins this work, supported by our:

- Behaviour Policy
- Regularly delivered inclusive PSHE curriculum encompassing:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice, and equality
  - Hate speech versus free speech
  - Body confidence and self-esteem
  - Recognition of abusive relationships, including coercive and controlling behaviours
  - Laws relating to sexual consent, exploitation, abuse, grooming, harassment, rape, domestic abuse, forced marriage, honour-based violence, FGM, and access to support
  - What constitutes sexual harassment and sexual violence, and unequivocal condemnation of such behaviour
  - Bullying and discrimination (including racism, ableism, sexism, homophobia, transphobia, and other forms of prejudice)
  - Online safety (privacy, digital footprint, misinformation/disinformation, cyberbullying, gaming risks, AI/deepfake challenges)
  - Mental and physical health and self-care
  - Diversity and inclusion (celebrating differences, disability awareness, LGBTQ+ inclusion)
  - Exploitation and broader contextual risks
  - Economic wellbeing and online pressures (advertising, scams, gambling, financial decision-making)
  - Preparation for independence (safe travel, responsible decision-making, personal responsibility).

ALFA is dedicated to tackling violence against women and girls. We will implement preventative education programmes that address this issue, promoting a culture of respect and safety for all learners. Staff will be trained to recognise and respond to signs of violence and abuse, ensuring that appropriate support and interventions are provided.

## 6. Confidentiality and Information Sharing

Confidentiality is essential to uphold the dignity and privacy of individuals involved in safeguarding matters; however, prompt information sharing remains a critical aspect of effective safeguarding. **Staff should not allow concerns about information sharing to hinder their responsibility to protect children.**

The following measures are implemented to ensure effective practice:

- **Confidential records** are securely maintained on CPOMS, accessible only by those with a legitimate professional need.
- Collaboration with the Data Protection Officer, as appropriate, ensures that the **Data Protection Act 2018** and **UK GDPR** do not impede the sharing of information necessary to safeguard children.
- Staff must **never guarantee confidentiality** to any child who discloses, or is affected by, abuse or neglect.
- The Designated Safeguarding Lead (DSL) will consider the child's wishes while ensuring the primary duty to protect the child and others is upheld.
- In most cases, parents or carers will be informed unless doing so would increase the risk to the child. It is the responsibility of the DSL or Headteacher to notify parents or designate an appropriate staff member for this task.
- If a child is at risk, in danger, or has been harmed, a referral must be made to children's social care.
- Incidents involving rape, assault by penetration, or sexual assault must also be reported to the police, even if the alleged perpetrator is under the age of ten.
- Staff recognise the importance of maintaining anonymity and adhere to the **7 golden rules of information sharing** as advised by DfE guidance.
- Where uncertainty exists, staff should **consult the DSL or Headteacher**.



## **7.1 Concerns about a staff member, supply teacher, volunteer or contractor**

If there are concerns regarding any individual employed by ALFA, whether directly or through a contract, who may pose a risk of harm to children, or if an allegation is made, all staff must report this to the Designated Safeguarding Lead (DSL) and the Headteacher immediately, and no later than the end of the working day. Should the concern or allegation pertain to the Headteacher, it is the responsibility of all staff members to notify the Chair of Governors (James Madine).

The Headteacher or the Chair of Governors will then proceed in accordance with the procedures outlined in appendix 3, where applicable.

If a conflict of interest exists in reporting a concern or allegation about any individual working within ALFA to the Headteacher, staff are permitted to report the matter directly to the Regional Director (Nicola Kelly) in the first instance.

## **7.2 Low Level Concerns**

A low-level concern refers to any issue, regardless of its significance, including those that may simply cause unease or a sense of 'nagging doubt'. Such concerns arise when an adult working in or on behalf of ALFA is perceived to have acted in a manner inconsistent with the Group's code of conduct - this encompasses inappropriate conduct outside of work - but does not meet the threshold for an allegation or warrant a referral to the local authority designated officer (LADO).

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

- Demonstrating excessive familiarity with learners, leading to blurred boundaries.
- Displaying favouritism or engaging with a learner one-on-one in a secluded area or behind a closed door.
- Using language that is inappropriate or offensive.

**All staff are required to report low-level concerns to the Headteacher at the earliest opportunity.** Whenever feasible, this should be communicated via email; if reported verbally, the Headteacher will document the conversation in writing.

**The Headteacher is responsible for maintaining comprehensive records of all low-level concerns and actions taken.**

## **8. Child-on-child abuse**

It is recognised that children may sometimes abuse other children. Such behaviour will not be tolerated or dismissed as banter, humour, or part of growing up, as this could contribute to inappropriate behaviour and an unsafe environment for learners.



### **8.1 Allegations of abuse made against other learners (known as child-on-child abuse)**

Incidents where learners harm others are typically addressed under the behaviour policy. However, this policy will apply to cases involving safeguarding concerns, such as when alleged behaviour:

- Is serious and potentially constitutes a criminal offence
- May put learners at risk
- Involves coercion or forcing learners to use drugs or alcohol
- Involves sexual exploitation, abuse, or harassment, including indecent exposure, sexual assault, upskirting, sharing of indecent images (including nudes and semi-nudes), or creating deep-fake explicit images.

### **8.2 Procedures for dealing with allegations of child-on-child abuse**

Allegations by a learner against another learner will follow established safeguarding procedures (see appendix 1 section A and B), reported to the DSL and recorded on CPOMS.

If the incident involves a potential criminal offence and there are delays in the criminal process, the DSL will cooperate with the police and other agencies as needed, while taking necessary measures regarding learner safety and discipline.

### **8.3 Creating a supportive environment to minimise the risk of child-on-child abuse**

The importance of proactive action to reduce risks associated with child-on-child abuse and fostering a supportive reporting environment is acknowledged.

To support this, ALFA will:

- Address derogatory or sexualised language and inappropriate behaviour between learners
- Monitor issues that affect different genders
- Use the curriculum to educate learners about appropriate, socially expected, and criminal behaviour, with particular attention to learners with SEN who may find these concepts challenging
- Ensure accessible reporting systems for all learners
- Remain alert to reports of violence or harassment, particularly those of a sexual or discriminatory nature, which may indicate broader issues. Identified issues will be handled through curriculum adaptation, staff training, policy updates, and, if suitable, collaboration with safeguarding partners.
- Provide support for learners affected by or witnessing child-on-child abuse, ensuring that all parties involved are protected from bullying or harassment
- Train staff to recognise indicators of child-on-child abuse and to respond appropriately, maintaining an outlook that such abuse could occur even in the absence of reports.

Disciplinary measures may proceed alongside external investigations, such as those by law enforcement. The Headteacher will determine on a case-by-case basis whether disciplinary actions might affect ongoing investigations and will consult with appropriate authorities as needed. Consideration will also be given to circumstances where conducting an internal review may not be reasonable during an independent investigation.

#### **8.4 Sharing of nudes and semi-nudes ('sexting')**

Current guidance for educational settings (UK Council for Internet Safety, 2024) defines this as sending or posting nude or semi-nude images, videos, or live streams online by individuals under 18. Alternative terminology may include 'dick pics' or 'pics'. Motivations behind sharing such imagery may not always be sexual or criminal.

**This guidance does not apply to adults sharing images of individuals under 18. Such behaviour is categorised as child sexual abuse and must be reported to police immediately.**

**All staff** are required to follow reporting and recording protocols as outlined in Appendix 1 Sections A and B.

#### **Staff must not:**

- Delete any image or instruct a learner to do so
- View, copy, print, share, store, or retain such imagery or ask a learner to do so; doing so can constitute a criminal offence. If imagery is viewed inadvertently, staff must report this to the DSL in writing immediately.

**In exceptional situations, the DSL (or equivalent) may view the image solely for safeguarding purposes, using professional judgement.**

#### **Referring to the police**

Decisions to refer incidents to the police or social care will be made individually, considering all relevant context. Where referral is required, the DSL (or Headteacher) will contact the police via 101.

#### **8.5 Escalation of Concerns**

All ALFA staff are introduced to a clearly defined escalation procedure. In situations where the escalation pertains to an external agency's response, the Designated Safeguarding Lead (DSL) should ensure that the concern is raised with the next appropriate level within that agency, such as a line manager.

The escalation process incorporates the following steps:

1. Report the concern in accordance with the procedure outlined in Appendix 1.
  - If necessary, escalate to the Safeguarding Assurance Manager for additional support or guidance, ensuring the relevant governor and Education Director/Regional Director are copied in.

- Should further escalation be required, involve the Safeguarding Director.

If any concern relates to the Headteacher, the Safeguarding Governor and the Education Director must be informed to ensure the issue is addressed externally from ALFA. Further guidance on this matter can be found in Section 5.

## **9. Learners with Increased Vulnerabilities**

### **9.1 Learners with Special Educational Needs or Health Conditions**

We acknowledge that learners with special educational needs (SEN) or certain health conditions may experience heightened safeguarding challenges and are statistically more susceptible to abuse than their peers.

Recognising abuse and neglect within this group can present additional complexities, such as:

- Attributing indicators of possible abuse - including changes in behaviour, mood, or injury - solely to the child's needs or health condition without adequate investigation.
- The potential for learners with SEN, disabilities, or specific health conditions to be disproportionately affected by behaviours such as bullying, even if they do not display outward signs.
- Communication barriers and challenges in reporting or managing these concerns.

To address these issues, we provide targeted training for staff on specific safeguarding considerations related to learners with SEN and health conditions.

### **9.2. Learners with a Social Worker**

Some learners require the support of a social worker due to safeguarding or welfare concerns. We recognise that adverse experiences and trauma can increase a child's vulnerability to further harm and impact attendance, learning, behaviour, and mental health.

The Designated Safeguarding Lead (DSL) and all staff members collaborate closely with social workers to protect vulnerable children.

When it is known that a learner has a social worker, the DSL always considers this information to ensure decisions prioritise the learner's safety, welfare, and educational outcomes. For instance, this may guide responses to:

- Missing education where safeguarding risks are identified.
- Provision of pastoral or academic support as appropriate.

### 9.3. Looked-after and Previously Looked-after Children

We are committed to ensuring that staff possess the knowledge, skills, and understanding necessary to safeguard looked-after and previously looked-after children. Specifically, we ensure that:

- Relevant staff members are informed about children's legal care status, contact arrangements with birth parents or individuals with parental responsibility, and current care provisions.
- The DSL maintains up-to-date details of each child's social worker and relevant virtual school headteachers.

The Headteacher is responsible for promoting the educational achievement of looked-after and previously looked-after children. As part of this role, the Headteacher will:

- Work in partnership with the DSL to ensure safeguarding concerns regarding looked-after and previously looked-after children are addressed swiftly and effectively;
- Collaborate with virtual school heads to support and enhance the educational progress of these children.

## 10. Whistleblowing

Keys Group maintains a distinct Whistleblowing Policy addressing issues related to the safeguarding of learners, encompassing concerns about inadequate or unsafe practices or possible failures. This policy is available for reference on RADAR.

## 11. Training

Staff and governors should consult *Appendix 9: Checklist for Governors*, which outlines statutory duties and procedural requirements for induction and refresher training.

### 11.1 All staff

All staff participate in safeguarding and child protection training as part of their induction, including training related to whistleblowing procedures and online safety, to ensure familiarity with the ALFA's safeguarding systems and responsibilities, as well as recognition of potential indicators of abuse or neglect.

Training is updated regularly and designed to:

- Be embedded within the ALFA's safeguarding policy, wider staff training, and curriculum planning.
- Align with the guidance provided by safeguarding partners.
- Address online safety expectations, roles, and responsibilities regarding filtering and monitoring.
- Reference Teachers' Standards, supporting expectations that all teachers:
  - Manage behaviour appropriately to maintain a safe environment.
  - Understand the needs of all learners.

- Having regard for the need to safeguard learners' wellbeing, in accordance with statutory provisions.

All staff complete training on the government's anti-radicalisation strategy, *Prevent*, aimed at recognising children at risk of involvement in terrorism and addressing extremist ideas.

Ongoing safeguarding and child protection updates, including topics on online safety, are provided as needed, and at least annually (for example, via emails, e-bulletins, or staff meetings).

Volunteers receive relevant training where applicable.

### **11.2 The DSL and Deputy DSLs**

The Designated Safeguarding Lead (DSL) and Deputy DSL undertake Level 3 child protection and safeguarding training at least every two years.

They also update their knowledge and skills regularly, at least annually, using resources such as e-bulletins, networking with other DSLs, attending Keys Education DSL events, or reviewing current safeguarding developments.

Prevent awareness training is also completed by the DSL and Deputy DSL.

### **11.3 Governors**

All governors complete at least Level 3 safeguarding and child protection training (including online safety) during their induction, with regular updates. This ensures they:

- Possess the necessary knowledge and information to perform their functions and understand their responsibilities, including providing strategic challenge.
- Can confirm that safeguarding policies and procedures are effective in delivering a comprehensive approach to safeguarding.

The Chair of Governors receives additional training in managing allegations, as they may need to act as the 'case manager' if an allegation is made against the Headteacher.

### **11.4 Recruitment – interview panels**

At least one member of every interview panel completes safer recruitment training, which covers at minimum the contents of Keeping Children Safe in Education and complies with local safeguarding procedures.

### **11.5 Staff who have contact with learners and families**

Staff working directly with children and families participate in supervision sessions with their line manager. These sessions offer support, coaching, training, promote the interests of children, and provide opportunities for confidential discussions of sensitive issues.

## **12. Monitoring Arrangements**

This policy will be reviewed **annually** by the Keys Group and the Headteacher

At every review, it will be approved by the full governing board.

## **Appendix 1: Procedures for Reporting and Recording**

### **Recognising Abuse and Taking Action**

All staff members, volunteers, and governors are required to adhere to the following procedures in the event of a safeguarding concern.

Please note: In this and subsequent sections, any reference to the Designated Safeguarding Lead (DSL) also applies to any deputy DSL.

#### **SECTION A: Immediate Actions if a Child is Suffering or Likely to Suffer Harm, or is in Immediate Danger**

1. Report the concern to the DSL.
  - 1a. If the DSL is unavailable, report to the Headteacher.
  - 1b. If neither is available, you must immediately refer the matter to children's social care and/or the police if you believe a child is at risk of harm or in immediate danger. Any individual can make such a referral.
2. Document all details related to the concern and/or referral on CPOMS as soon as possible, and no later than the end of the working day.

#### **SECTION B: Responding to a Disclosure of a Safeguarding Issue by a Child**

1. Listen attentively and take the disclosure seriously, allowing the child sufficient time to express themselves without asking leading questions.
2. Remain calm and do not display shock or distress.
3. Acknowledge the child's decision to confide in you and refrain from suggesting they should have disclosed sooner.
4. Explain the next steps, clarifying that you are obligated to share this information. Do not promise confidentiality.
5. Record the conversation at the earliest opportunity on CPOMS, prior to the close of the working day. Ensure an objective account is provided, delineating direct quotations from the child using quotation marks.
6. Follow the reporting procedures outlined in Section A.

#### **SECTION C: Addressing Concerns Not Based on Direct Disclosure**

Be mindful that some children may:

- Not feel prepared or know how to disclose abuse, exploitation, or neglect.
- Fail to identify their experiences as harmful.
- Feel embarrassed, ashamed, or threatened. These feelings may arise due to vulnerability, disability, sexual orientation, or language barriers.

These factors must not deter you from exercising professional curiosity. If you have concerns about a child, consult the DSL and ensure these concerns are recorded on CPOMS promptly. If necessary, follow the processes described in Section A.



## SECTION D: Female Genital Mutilation (FGM)

Any teacher who becomes aware or has credible evidence that a child has been subjected to FGM, as defined below, is legally required to report this directly and immediately to the police. This statutory duty carries disciplinary consequences for non-compliance. The requirement does not apply in cases where a learner is at risk of FGM or suspicion exists without confirmation. Staff must not physically examine learners. If there is risk or suspicion, teachers should follow the procedures detailed in Section A.

Unless instructed otherwise, staff should also discuss the case with the DSL and involve children's social care as appropriate.

### **Definition of FGM:**

In accordance with Keeping Children Safe in Education, FGM includes “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.”

FGM is illegal in the UK and constitutes a form of child abuse with serious, long-term consequences. It may also be referred to as ‘female genital cutting,’ ‘circumcision,’ or ‘initiation.’

Any other staff member who discovers that FGM appears to have been performed on a learner under 18 must inform the DSL and proceed according to Section A.

Any staff member who suspects a learner is at risk of FGM or suspects FGM has occurred must speak to the DSL and observe local safeguarding protocols.

## **SECTION E: Concerns Related to Radicalisation, Extremism, or Terrorist Activity**

Initially, follow the procedures set out in Sections A and B. The Department for Education provides a dedicated helpline (020 7340 7264) for staff and governors to report concerns regarding learner extremism. Alternatively, concerns can be emailed to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).

In emergencies, contact 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Believe any person is in immediate danger;
- Suspect someone is planning to travel to join an extremist group;
- Observe or hear anything potentially related to terrorism.

## Appendix 2: Recording and Storing Data

### Record-keeping

Learner protection and safeguarding records will be maintained using CPOMS.

All safeguarding concerns, related discussions, decisions, and the rationale for those decisions must be documented in writing. If there is uncertainty regarding whether to record specific information, staff should consult with the DSL for guidance.

Records shall include:

- A clear and comprehensive summary of each concern
- Details outlining how the concern was addressed and resolved
- Documentation of actions taken, decisions made, and final outcomes

Each learner will have a dedicated child protection file.

Non-confidential records will remain readily accessible. Confidential documentation will be stored securely and made available only to individuals with a legitimate or professional need to access them.

Safeguarding records pertaining to individual children will be retained for an appropriate period following their departure from ALFA.

When a learner with current or previous safeguarding concerns transfers to another institution, the DSL will ensure their child protection file is transferred promptly, securely, and separately from the main learner file. Electronic transfer via CPOMS will be utilised.

To facilitate support for the child upon arrival at the new school, college or alternative provider files should be transferred within:

- **5 days** for in-year transfers, or
- **The first 5 days** of the start of a new term

For cases involving significant or complex concerns, or where social services are involved, the DSL will directly communicate with the receiving school's DSL to provide pertinent information, allowing for necessary preparations to safeguard the child.

Where staff, volunteers, agency personnel, or visitors have a concern, it must be recorded on a paper form and submitted to the DSL for inclusion in CPOMS. The DSL will enter details from the written record and scan it into the learner's CPOMS file.

## **Appendix 3: Recruitment and Selection Process**

To recruit individuals appropriately, all staff involved in recruitment and employment for positions working with children will be required to complete relevant safer recruitment training.

### **Application Forms**

Application forms will:

- Include a statement indicating that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity with children, when applicable.

### **Shortlisting**

The shortlisting process will:

- Review any inconsistencies, identify gaps in employment, and examine provided reasons.
- Assess potential concerns.

Shortlisted candidates will be requested to:

- Complete a self-declaration of their criminal record or any information that may make them unsuitable to work with children, allowing for discussion during the interview stage.

The requested information will include:

- Criminal history
- Inclusion on the barred list
- Prohibition from teaching
- Criminal offences committed in any country in accordance with laws applicable in England and Wales
- Any relevant overseas information

Candidates will also sign a declaration confirming the accuracy of the information provided.

An online search will be conducted on shortlisted candidates to identify publicly available incidents or issues. Candidates will be notified that these checks are part of the standard due diligence process.

### **Seeking References and Checking Employment History**

References will be obtained before interviews, with any concerns addressed with referees and discussed with the candidate during the interview.

Reference procedures will:

- Not accept open references.
- Involve direct communication with referees and verification of reference information.
- Ensure references originate from the candidate's current employer and are completed by a senior individual. If the referee is school-based, confirmation from the Headteacher regarding disciplinary investigation accuracy will be sought.
- Verify the most recent relevant period of employment if the candidate is not currently employed.
- Obtain a reference from the last employer where the candidate worked with children if they are not currently doing so.
- Compare application form details with reference information, resolving any inconsistencies with the candidate.
- Address and resolve all concerns prior to appointment confirmation.

## **Interview and Selection**

During interviews, the following will occur:

- Inquiry into gaps in employment or frequent changes in employment/location, requesting candidates to provide explanations.
- Examination of potential areas of concern to assess suitability for work with children.
- Documentation of all considered information and decisions made.

## **Pre-appointment Vetting Checks**

All details regarding vetting procedures are recorded in the single central record (SCR), and relevant documentation is stored in individual personnel files. Procedures adhere to statutory requirements and best practices for document retention as outlined below.

## **New Staff**

Employment offers are subject to satisfactory completion of all necessary pre-employment checks. When recruiting new staff, the following steps will be taken:-

- Identity verification.
- Obtaining an enhanced DBS certificate via the applicant, including barred list information for those engaged in regulated activity (see definition below). The certificate will be obtained before or as soon as practicable after appointment, using the DBS update service if applicable. Copies of the certificate will not be retained for more than six months, though records of the check, its outcome, and the recruitment decision may be kept.

- Conducting a separate barred list check if work in regulated activity commences prior to receipt of the DBS certificate.
- Verifying mental and physical fitness to undertake job responsibilities.
- Checking the right to work in the UK, with verification retained for the duration of employment and two years afterward.
- Confirming professional qualifications where relevant.
- Ensuring teachers are not subject to a prohibition order.
- Conducting additional checks for candidates who have lived or worked outside the UK, as appropriate. These may include:
  - Criminal record checks for overseas applicants for all staff, including teaching positions.
  - For teaching roles: obtaining confirmation from the relevant professional authority in the foreign country that no sanctions or restrictions have been imposed, and there is no reason to consider the individual unsuitable to teach.

For management positions, candidates must not be subject to a section 128 prohibition from management direction issued by the Secretary of State.

**Regulated Activity** refers to individuals who:

- Regularly teach, train, instruct, care for, or supervise children in a school or college.
- Perform paid or unsupervised unpaid work regularly in settings where such work provides potential contact with children.
- Provide intimate or personal care, or participate in overnight activities, even on a one-time basis and regardless of supervision.

## Existing Staff

Relevant checks may be conducted for existing staff under certain circumstances, treating them as new staff members, such as when:

- Concerns arise regarding their suitability to work with children.
- Individuals transfer from a non-regulated to a regulated activity role.
- There is a break in service of twelve weeks or longer.

Referrals to the DBS will be made for anyone considered to have harmed or posed a risk of harm to a child or vulnerable adult, where:

- There is belief the individual has engaged in relevant conduct.
- They have received a caution or conviction for an offence specified under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.
- The 'harm test' is met (i.e., the individual may harm or place a child or vulnerable adult at risk).
- The individual is removed or would have been removed from regulated activity (paid or unpaid) had they not left.

## **Agency and Third-party Staff**

Written notification will be obtained from any agency or third-party organisation confirming completion of the required safer recruitment checks equivalent to those conducted by ALFA. Identity verification of the individual presenting for work will also be undertaken to ensure consistency with the completed checks.

## **Governors**

All governors will receive an enhanced DBS check with barred list information. This check will also apply if a governor is involved in regulated activity. All governors are subject to a section 128 check, as a section 128 direction disqualifies an individual from holding a position as a maintained school governor. The chair of the board's DBS check will be countersigned by the Secretary of State.

All proprietors, trustees, local governors, and members will undergo the following checks:

- Section 128 check (to assess prohibition under section 128 of the Education and Skills Act 2008)
- Identity verification
- Right to work in the UK
- Additional relevant checks if they have lived or worked outside the UK.

## Appendix 4

Keys Group Third Floor,  
Maybrook House,  
Queensway, Halesowen,  
B63 4AH

### Safeguarding Champions

<b>KEYS DESIGNATED OFFICERS:</b>	<b>JAMES MADINE (Chair of Governors) JULIE HAMILTON (Safeguarding Governor)</b>	07773 474876  07789 996850
<b>DESIGNATED SAFEGUARDING LEAD</b>	<b>Mitchell Rose</b>	<b>07354 902 177</b>
<b>DEPUTY DESIGNATED SAFEGUARDING LEAD</b>	<b>Asa Cresey</b>	<b>07394 875 704</b>
<b>SAFEGUARDING ASSURANCE MANAGER</b>	<b>Martin Keightley</b>	<b>07547 101 936</b>
<b>MENTAL HEALTH FIRST AIDER</b>	<b>Catrin Jones</b>	

### Responsibilities of Safeguarding Champions include:

- Ensuring Keys Group's full compliance with the standards set by the Local Safeguarding Children Partnership (LSCP) for managing allegations, as stipulated in Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025. This includes integrating LSCP procedures into Keys Group policies and practices.
- Guaranteeing that all staff members are informed of, and adhere to, protocols concerning allegations against adults working with or on behalf of children.
- Establishing robust systems within Keys Group to review cases, identify areas for improvement, and implement changes that enhance procedures and practices.
- Addressing and resolving any inter-agency challenges that may hinder the effective application of LSCP procedures.
- Ensuring that the designated roles are accurately incorporated within Keys Group's policies and procedures.
- Maintaining effective arrangements for reporting and record-keeping across Keys Group.



## **Appendix 5**

### **Reporting and Referring Contact Information**

Keys Group  
Third Floor  
Maybrook House  
Queensway  
Halesowen  
B63 4AH

### **Allegations Against Staff**

All allegations involving a member of staff must be reported to the Local Safeguarding Children's Partnership Designated Person, specifically the LADO (Local Authority Designated Officer). The appropriate LADO will be notified in line with these procedures.

In addition, the placing authority responsible for the child or children involved must be informed. If outside normal working hours, please notify the Emergency Duty Team (EDT).

Please ensure the Red Flag procedure is followed to inform senior managers within Keys.

### **Safeguarding Children**

Children Protection / Safeguarding Concerns – Not Involving Allegations Against Staff

All safeguarding concerns must be reported immediately to the designated contact at the local authority where the learner is located. For out-of-hours situations, please notify the Emergency Duty Team (EDT).

The placing authority responsible for the affected child or children must also be informed. In out-of-hours cases, contact should be made with EDT.

Please follow the Red Flag procedure to ensure senior managers within Keys are appropriately notified.

**Appendix 6 – to be completed at the start of the academic year and reviewed termly by DSL then shared with staff as appropriate.(to be used for off site learning with a learner)**

### **Contextual Safeguarding Information and Location Risk Assessment**

**The local area context (N/A)**

**Local bus routes and stops nearby (N/A)**

**Local train stations and stops nearby (N/A)**

**Any known destinations, if children abscond (N/A)**

**Any information about known gangs (or unaffiliated groups of younger) operating around the home and potential disputes arising: (N/A)**

**Any criminality hot spots in the area: (N/A)**

**Any known drug hot spots in the area: (N/A)**

### **Appendix 7: Safeguarding Oversight and Information for Display**

**The Designated Safeguarding Lead (DSL) is the primary safeguarding officer for ALFA. Any additional staff trained to this level serve as deputies and provide cover in the DSL's absence.**

It is essential that the DSL demonstrates comprehensive oversight of all safeguarding incidents occurring within ALFA. The DSL is responsible for being fully informed about

every referral and for ensuring that all concerns are appropriately addressed and followed up.

All ALFA staff should know:

- The names and roles of the DSL, Deputy DSL(s). Only one individual may serve as the lead DSL.
- Contact details for senior leaders overseeing safeguarding, including the Safeguarding Governor.
- Contact information for designated local authority safeguarding contacts, as well as details for Ofsted, the police, and Childline (for learners).
- A copy of the ALFAs safeguarding policy and any appendices.
- The latest version of KCSIE Part 1.
- Information identifying relevant key policies such as:
  - Whistleblowing Policy
  - Grievance Policy

## **Safeguarding Training**

All new staff members receive safeguarding training as part of their induction process.

All staff participate in face-to-face safeguarding refresher training on an annual basis.

In addition, staff are required to complete mandatory online safeguarding modules covering:

- Female Genital Mutilation (FGM)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Peer-on-Peer Abuse
- Neglect
- Honour-Based Abuse and Forced Marriage
- Serious Youth Violence
- Sexual Violence and Harassment
- Online Abuse and Internet Safety

## **The Prevent Duty**

Completion of the Prevent Duty training course is mandatory for all staff members.

## Appendix 8

**Please note: All body maps must be completed on CPOMS rather than on paper.**

### Body Map Guidance

Body maps serve as a tool to accurately document and illustrate observable signs of harm and physical injuries.

Clothing should not be removed for examination purposes unless access to the injury site is already available due to medical treatment.

**\*Photographic evidence of injuries or marks on a child should not be taken by any individual teacher, staff member, or ALFA. Instead, utilise the body map on CPOMS, like the one as illustrated below. All concerns must be reported and documented promptly through the appropriate safeguarding channels, such as MAST or the child's social worker if the case is already open with social care.**

**When recording an injury, ensure you include the following details for each mark observed, including but not limited to: redness, swelling, bruising, cuts, lacerations, wounds, scalds, and burns:-**

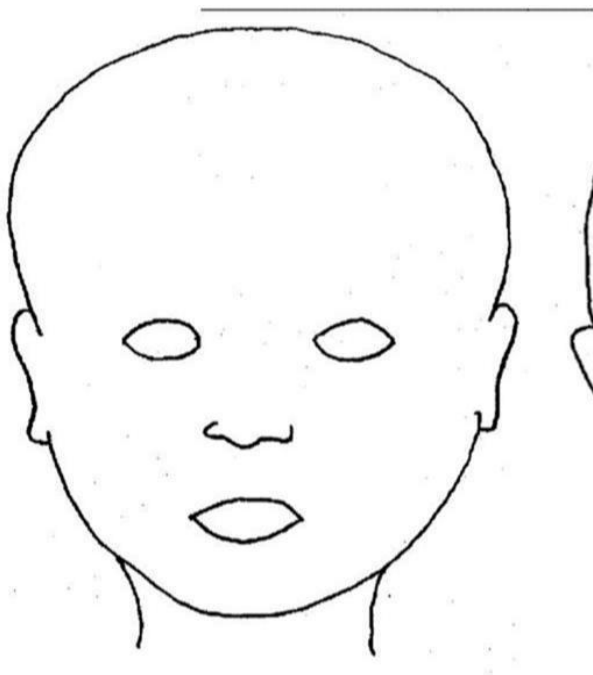
- Specific location of the injury on the body (e.g., upper outer arm/left cheek)
- Size of the injury in centimetres or inches
- Approximate shape (e.g., round, square, straight line)
- Colour(s) present; specify if multiple colours are involved
- Indication of whether the skin is broken
- Presence of swelling at the injury site or elsewhere
- Note any scabbing, blistering, or bleeding
- Description of cleanliness (e.g., presence of grit or fluff)
- Any restriction in mobility linked to the injury
- Whether the site feels hot to the touch
- Whether the child feels generally hot
- Whether the child reports pain
- Any changes in the child's posture or body shape

Ensure that both the date and time of the recording are clearly stated, along with the name and role of the individual making the record. Additional relevant comments should be included as necessary.

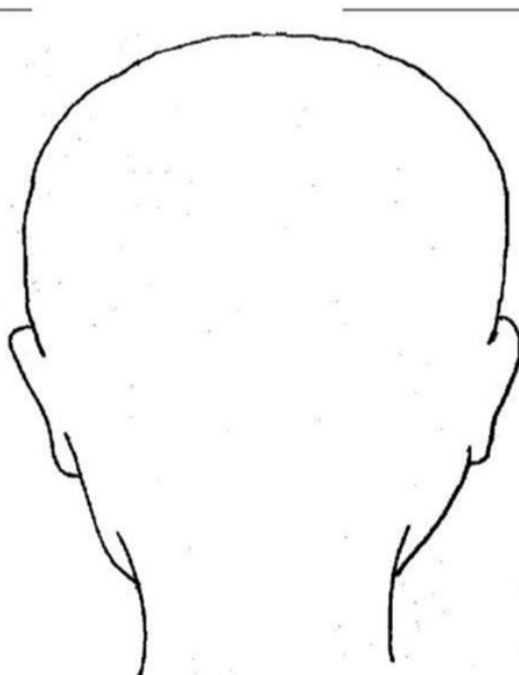
**Provide First Aid as needed and document all actions appropriately.**

A copy of the completed body map should be retained in the child's concern/confidential file on CPOMS.

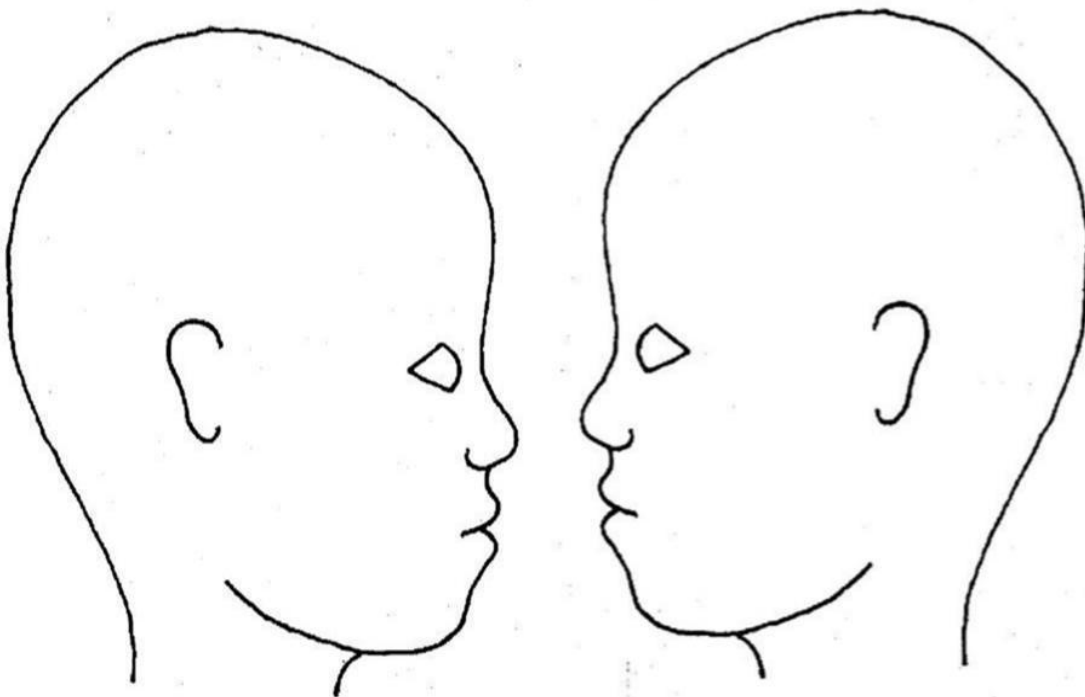
Name of learner: \_\_\_\_\_ Date and time of observation: \_\_\_\_\_  
\_\_\_\_\_



**FRONT**



**BACK**

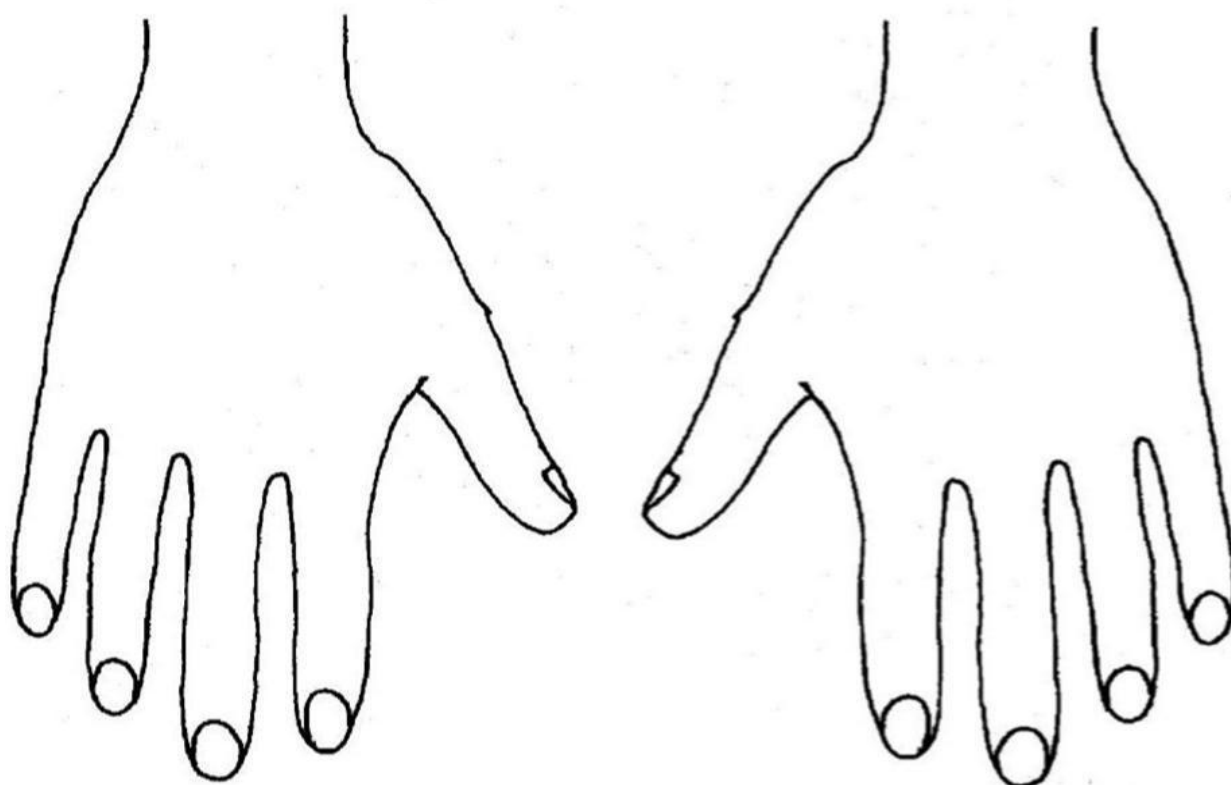


**RIGHT**

**LEFT**

Name of learner: \_\_\_\_\_

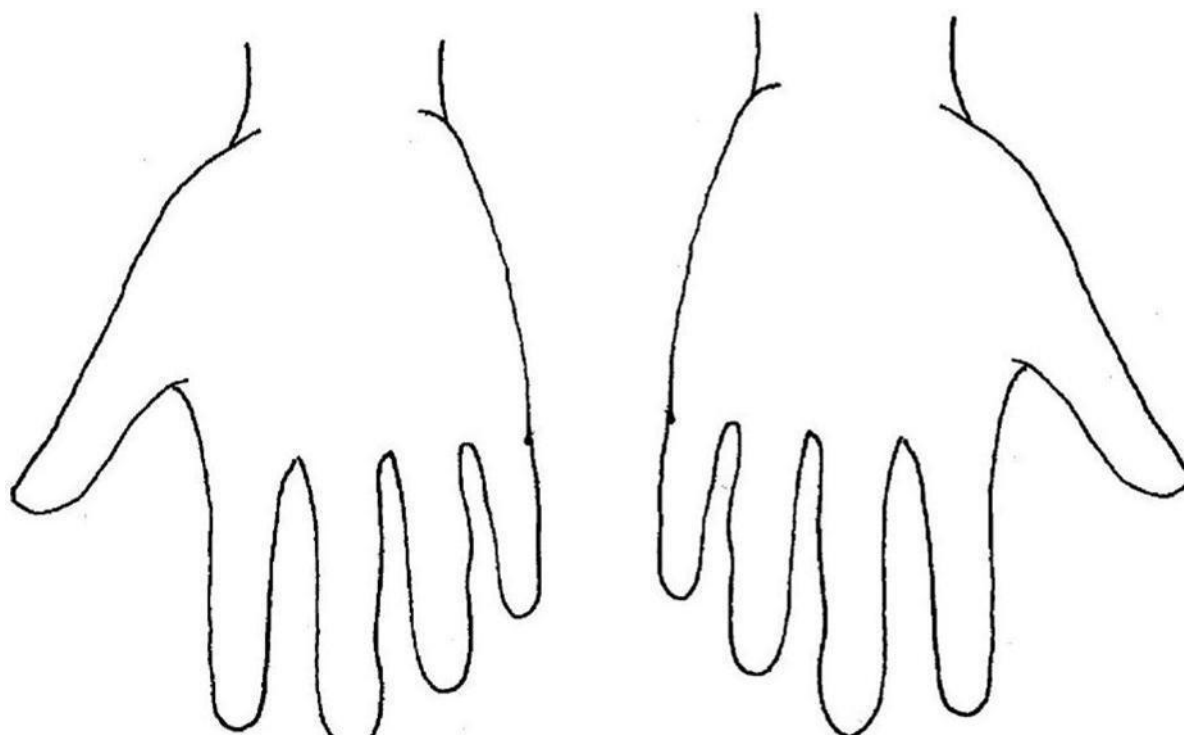
Date and time of observation: \_\_\_\_\_  
\_\_\_\_\_



**R**

**BACK**

**L**



**R**

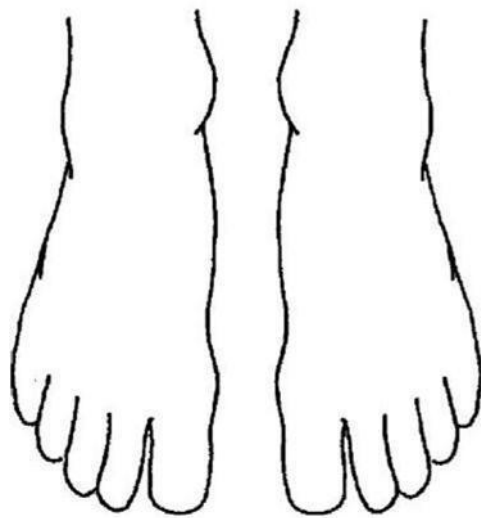
**FRONT**

**L**



Name of learner: \_\_\_\_\_

Date and time of observation: \_\_\_\_\_



**R TOP**

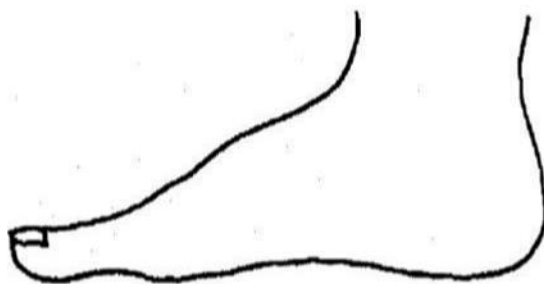
**L TOP**



**R BOTTOM**

**L**

**BOTTOM**

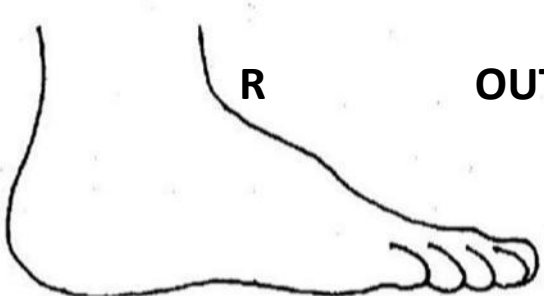


**R**

**INNER**

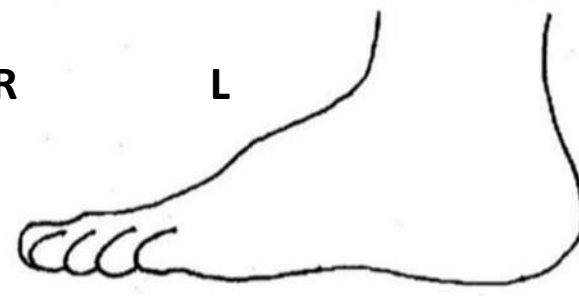


**L**



**R**

**OUTER**



**L**



## **Appendix 9: Checklist for Staff and Governors**

This checklist outlines essential responsibilities, protocols, and statutory references derived from the safeguarding policy. It is intended for use during staff induction and as part of ongoing refresher training.

### **Statutory References**

- Ensure familiarity with 'Keeping Children Safe in Education (KCSIE) 2025'.
- Adhere to 'Working Together to Safeguard Children (2023)'.
- Understand obligations under the Children Act 1989 and 2004.
- Be cognisant of the Prevent Duty as stipulated by the Counter-Terrorism and Security Act 2015.
- Comply with the Equality Act 2010 and the Human Rights Act 1998.

### **Roles and Responsibilities**

- All staff are required to read Part 1 and Annex B of KCSIE annually and provide a signed declaration of comprehension.
- The Designated Safeguarding Lead (DSL) must be a senior member of the leadership team, responsible for overseeing all aspects of safeguarding and child protection.
- Deputy DSLs are to support the DSL and act on their behalf when necessary.
- Governors are expected to appoint a designated safeguarding lead and oversee full implementation of safeguarding policies.
- The Headteacher is responsible for ensuring staff receive appropriate training and that safeguarding policies are effectively communicated to parents and carers.
- The Education Director serves as an alternate DSL if required.

### **Safeguarding Procedures**

- All concerns must be promptly reported to the DSL or Deputy DSL.
- Safeguarding concerns should be recorded using CPOMS.
- Immediate referral to children's social care or the police is required if a child is at risk of harm.
- Follow established procedures for disclosures, FGM, extremism, and mental health issues.
- Adhere to guidance on managing low-level concerns and allegations.
- Conduct contextual safeguarding risk assessments as required.

### **Child-on-Child Abuse and Online Safety**

- Proactively challenge inappropriate behaviour and language among learners.
- Deliver education to learners regarding consent, healthy relationships, and online safety.

- Report any incidents of sexual harassment, violence, or sexting directly to the DSL.
- Maintain effective filtering and monitoring systems for online safety.
- Support both victims and alleged perpetrators through comprehensive risk assessments and intervention plans.

### **SEND and Vulnerable Learners**

- Offer additional pastoral support and assign key workers for learners with SEND.
- Remain vigilant to barriers to disclosure and indicators of abuse within vulnerable groups.
- Implement tailored safeguarding adaptations in RSHE and tutorial programmes.
- ALFA is committed to supporting gender questioning children. We recognise the importance of creating a safe and inclusive environment where all children feel respected and supported. Staff will receive training on how to support gender questioning children, ensuring that their needs are met and they feel safe within ALFA.

### **Training and Monitoring**

- Complete mandatory induction and annual safeguarding training.
- Undertake Prevent awareness training as required.
- Governors must participate in safeguarding training upon induction and at regular intervals thereafter.
- The DSL and deputies are required to complete Level 3 safeguarding training biennially.
- Review and update the safeguarding policy and associated procedures annually.