Child Protection & Safeguarding Policy and Procedures

POLICY APPROVAL					
Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature:	Date: May 2026	
Policy Review Date	May 2027				

Futures Changing Ltd Child Protection & Safeguarding Commitment Statement
Within Futures Changing Ltd, we are firmly committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults in line with legal and statutory guidance. In particular, we adhere to the expectations set out in Keeping Children Safe in Education 2025 (KCSIE) and the Disclosure and Barring Service (DBS) Code of Practice.

We believe that everyone has the right to be safe, respected, and valued. To uphold this, we commit to:

1. Engraining a Robust Safeguarding Framework Throughout all Business Practices

Ensuring we have in place clear policies and procedures for child protection that fulfil KCSIE 2025 requirements, including systems for managing low-level concerns, allegations, behaviour, and online safety.

Providing regular, updated safeguarding training to all staff, volunteers, and relevant partners, so they know their responsibilities, what to do if they have concerns, and how to respond appropriately.

2. Safer Recruitment & DBS Checks Processes

Conducting safer recruitment processes in accordance with KCSIE 2025, including enhanced DBS checks (with barred list checks where required), checks on overseas work or residence, maintaining a Single Central Record of all required pre-employment checks, and following all statutory safer recruitment steps.

Ensuring we comply with the DBS Code of Practice in handling disclosure information: treating it fairly, safeguarding its confidentiality, not discriminating based on unrelated criminal history, and retaining or disposing of disclosure data in accordance with legal/data protection requirements.

3. Accountability & Leadership

Having a designated safeguarding lead (and deputies) with sufficient authority, time, resources, and training to carry out their safeguarding duties.

Ensuring governance oversight of all safeguarding and DBS procedures (e.g. ensuring policies are up to date, recruitment practices are followed, disclosures handled appropriately, and any safeguarding incident or allegation is managed correctly).

4. Culture of Openness, Transparency & Continuous Improvement

Encouraging the reporting of both concerns and low-level issues; ensuring these are recorded, investigated, and addressed promptly.

Continually reviewing safeguarding policies, practice, and risk (including online safety, contextual risks, and emerging safeguarding issues) to ensure they remain effective and in line with the latest guidance.

Including safeguarding as a permanent agenda point within all applicable meetings.

Holding designated safeguarding meetings for the Lead and deputies to formulate meaningful actions to support the continual evolvement of safeguarding practices within all business activity.

5. Data Protection & Confidentiality

Safeguarding personal data and handling DBS disclosures with strict confidentiality, observing the relevant data protection laws (e.g. UK GDPR), ensuring only authorised staff access such information, and that information is stored, shared, or disposed of appropriately.

Ensuring that any decisions related to DBS information are made fairly, with due regard to the relevance of the information to the role and follow a transparent process.

We expect every member of staff, volunteer, contractor, and service partner to uphold this commitment. Any failure to comply with our safeguarding policies or with the DBS Code of Practice will be taken seriously and may result in disciplinary or legal action.

Signed:  Date: 23rd September 2025

Loren Janes **Designated Safeguarding Lead & Managing Director**

Signed  Date: 23rd September 2025

Charlotte Manford **Deputy Safeguarding Officer & Head of People, Quality and Compliance**

1. Overview

Futures Changing Ltd believes in supporting all aspects of children and young people's development and learning, including keeping children safe. We understand that children and young people can and do experience social, personal and emotional barriers to their learning, over differing periods of time and at different stages of their development, which can have an effect on their academic learning. We recognise that education staff play a crucial role in helping to identify welfare concerns and indicators of possible abuse or neglect at an early stage.

At Futures Changing, safeguarding and promoting the welfare of children is at the heart of everything we do. We recognise that we are part of the wider safeguarding system and work closely with partners to ensure children receive the right support at the right time.

We believe that safeguarding is everyone's responsibility. Every member of staff, regardless of role, has a duty to protect children, create safe environments, and act promptly on concerns. Children are defined as anyone under the age of 18, and we remain committed to placing their needs and best interests at the centre of all decision-making.

Our approach is child centred. We know no single practitioner can have a complete picture of a child's needs and circumstances. By working together, sharing information appropriately, and taking timely action, we can achieve the best outcomes for children and young people.

For us, safeguarding means:

- Providing help and support as soon as difficulties emerge.
- Protecting children from maltreatment, whether at home, in the community, or online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring children grow up with safe and effective care.
- Acting so every child can achieve the best possible outcomes.

All staff have a responsibility to remain alert to children who may benefit from early help, to identify concerns swiftly, and to support colleagues, social workers, and other agencies in safeguarding practice.

We are committed to ensuring that our Designated Safeguarding Lead (DSL) and deputies are given the time, training, and resources needed to maintain a complete safeguarding overview. They provide advice and support to staff and work closely with local authority children's social care and external partners.

As part of our professional standards, we expect staff to uphold the highest levels of integrity and to safeguard children's wellbeing as part of their daily duties. This reflects not only our organisational values but also the professional standards set for educators and those working with children.

(As detailing within Keeping Children Safe in Education, DfE, 2025 publication)

Futures Changing Ltd.'s Child Protection Procedures are for all staff, parents/carers, directors, volunteers and anyone involved in our community. It forms part of the safeguarding arrangements for our organisation. It should be read in conjunction with the following:

- Keeping Children Safe in Education September 2025
- The safeguarding response to children missing from education
- The role of the designated safeguarding lead (Annex C of KCSIE)
- Learner Code of Conduct
- Staff Code of Conduct
- Behaviour & Anti Bullying Policy
- E- Safety Policy
- Learner Code of Conduct

- Safer Recruitment Policy
- Recruitment of Offenders Policy
- Relationships & Sex Educational Policy
- Staff Qualifications, Development and Training Policy
- Parent Engagement Policy & Strategy
- Whistleblowing Policy
- Preventing Extremism and Radicalisation Policy
- Modern Slavery and Human Trafficking Policy
- Learner Attendance and Abscondence Policy
- Educational Trips and Visits Policy

Safeguarding and promoting the welfare of children (everyone under the age of 18) is defined in Keeping Children Safe in Education as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the
- home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Our setting has a whole provision approach to safeguarding which ensures that keeping children safe is at the heart of everything we do and underpins all systems, processes and policies. It is important that our values are understood and shared by all children, staff, parents/carers, and the wider community. Only by working in partnership, can we truly keep children safe.

As an Alternative Provision, Futures Changing Ltd is fully committed to meeting the safeguarding expectations set out in Keeping Children Safe in Education (2025) and associated DfE guidance.

We recognise that children and young people attending alternative provision can be particularly vulnerable, and we therefore ensure that:

- All staff, volunteers, and contractors undergo the appropriate safer recruitment checks in line with statutory requirements. Written confirmation of safeguarding checks is maintained and available for inspection.
- Full records are kept of our registered address, as well as any subcontracted provision or satellite sites used, with safeguarding arrangements reviewed for each setting.
- Safeguarding responsibilities are clear, transparent, and embedded in all aspects of provision, with staff trained to identify and act on any concerns.
- Placements when utilised during WEX are regularly reviewed to ensure they continue to be safe, appropriate, and effective in meeting the needs of each learner.
- Where safeguarding concerns arise, placements are reviewed immediately and may be ended if necessary to protect the child or young person.
- We maintain open communication with referring schools, local authorities, parents/carers, and other professionals to ensure a joined-up safeguarding approach.

By embedding these principles, Futures Changing Ltd provides a safe, responsive, and child-centred environment in which learners can thrive.

2. Safeguarding Responsibility in Alternative Provision

Futures Changing Ltd retains full safeguarding responsibility for all learners placed in Alternative Provision (AP), whether on-site or commissioned through a third-party provider. The DSL and senior leadership team oversee all safeguarding arrangements, including attendance, welfare, and risk monitoring, with recognition of the additional vulnerabilities of AP learners.

Pre-Placement Checks: Written confirmation must be obtained from any AP provider that all statutory safeguarding and safer recruitment checks have been completed. Providers must notify Futures Changing Ltd promptly of any staff or site changes that may affect safeguarding.

Record-Keeping: All safeguarding concerns, low-level concerns, allegations, and incidents must be recorded in CPOMS/My Concern, including chronology, actions taken, and the rationale for decisions.

Review and Oversight: AP placements are reviewed at least every half term to ensure they remain suitable, safe, and effective in meeting learners' educational, pastoral, and safeguarding needs. The DSL, Deputy DSL(s), and senior leadership hold monthly safeguarding meetings to review patterns, concerns, and records. Any safeguarding concerns are addressed immediately, with escalation to the LADO, Children's Social Care, or other relevant agencies as required.

Equivalence of Standards: All safeguarding procedures that apply within Futures Changing Ltd provision, including staff training, online safety, filtering and monitoring, and low-level concern management, also apply to AP learners.

Communication: Futures Changing Ltd maintains ongoing communication with AP providers, commissioning bodies, referring schools, parents/carers, and safeguarding partners to ensure the learner's welfare is monitored and any risks are mitigated.

3. Expectations

All staff and volunteers must read and agree to these procedures before they start working with us. All learners and their families will be made aware of these procedures, and they are freely available within our website . It is important for families to be aware of actions staff may take if there are any concerns for a learner's safety, and for them to understand that they might not be consulted before action is taken. Knowing about child protection procedures ahead of time helps parents/carers to engage better in the process, meaning that change is more likely to take place.

All adults working in our school who have contact with students are in positions of trust. Staff and volunteers should understand their responsibilities to safeguard and promote the welfare of students.

This means that staff and volunteers:

- are responsible for their own actions and behaviour and must avoid any conduct which would lead any reasonable person to question their motivation or intentions
- must work, and be seen to work, in an open and transparent way
- must acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- must discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- must apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief or sexual orientation
- must not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for our learners
- must be aware that breaches of the law and other professional guidelines could result in disciplinary action
- being taken against them, criminal action and/or other proceedings including barring by the Disclosure and

- Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from

4. Statutory Framework

There is government guidance set out in Working Together to Safeguard Children (DfE 2023) on how agencies must work in partnership to keep children safe. This guidance places a shared and equal duty on three Safeguarding Partners (the Local Authority, Police and Health) to work together to safeguard and promote the welfare of all children in their area under multi-agency safeguarding arrangements. These arrangements sit under the Essex Safeguarding Children Board (ESCB). In Essex, the statutory partners are Essex County Council, Essex Police and three NHS Integrated Care Boards covering the county.

In addition to national statutory guidance, in Essex, all professionals must work in accordance with the SET Procedures. Our school also works in accordance with the following legislation and guidance *(this is not an exhaustive list)*:

Core Statutory Guidance (National)

- Keeping Children Safe in Education (DfE, 2025)
- Working Together to Safeguard Children (DfE, 2023)
- Working Together to Improve Attendance (DfE, 2024)
- School Suspensions and Permanent Exclusions (DfE, 2024)
- Behaviour in Schools (DfE, 2022) – *check for updates in 2025/26*
- Searching, Screening and Confiscation (DfE, 2022)
- Filtering and Monitoring Standards (DfE, 2024)

Legislation

- Education Act (2002)
- Children Act (1989)
- Children Act (2004)
- Children and Social Work Act (2017)
- Education (Pupil Registration) Regulations (2006, as amended)
- Sexual Offences Act (2003)
- Female Genital Mutilation Act 2003 (as amended by Serious Crime Act 2015)
- Counter-Terrorism and Security Act (2015) – *Prevent Duty*
- Data Protection Act (2018)

Supplementary Guidance

- Teaching Online Safety in Schools (DfE, 2023) – ensure aligned with KCSIE 2025
- Information Sharing Advice for Safeguarding Practitioners (HMG, 2018)
- Children Missing Education – statutory guidance (DfE, 2016)
- What to do if you're worried a child is being abused (HMG, 2015) – *dated, use alongside KCSIE*
- Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance (Home Office, 2018)

Local (Essex-specific)

- Essex Effective Support (latest version – check 2024/25 update)
- Education Access Team CME / Home Education Policy and Practice (ECC, 2023)
- Understanding and Supporting Behaviour and Appendices (ECC, 2024)
- Let's Talk: Reducing the Risk of Suicide (ESCB, 2021)

5. Essex County Council (ECC) – Authorised Representatives and Safeguarding Disclosure Process

Futures Changing Ltd confirms that Essex County Council's authorised representatives are formally listed as approved contacts for receiving safeguarding disclosures relating to any learner funded, placed, or supported by ECC.

The lead authorised representative is:

Charlotte Manford – Lead ECC Authorised Representative

The approved additional representative is:

Loren Janes – ECC Authorised Representative

These representatives are included within the organisation's Safeguarding Contact Directory and embedded across all reporting procedures.

Futures Changing Ltd utilises the ECC Safeguarding Platform and Renewal Service in line with our contractual agreement. All required checks, notifications, updates, and renewals are completed through the ECC portal to ensure full compliance, transparency, and accurate information-sharing.

Where a safeguarding disclosure, concern, or allegation involves an ECC learner, commissioned service, or any matter that triggers contractual or statutory reporting obligations, the ECC authorised representatives listed above will be contacted without delay. All communication and information-sharing are conducted in line with Working Together to Safeguard Children (2023), KCSIE 2025, Essex Safeguarding Children Board (ESCB) guidance, data-protection legislation, and ECC partnership requirements.

Futures Changing Ltd remains committed to full cooperation with ECC's authorised representatives in all safeguarding enquiries, multi-agency responses, and portal-based monitoring or review processes.

6. Staff Training

All staff receive appropriate safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. This training will be regularly updated. All training will be recorded within the staff training matrix which is discussed at the monthly team meetings. All training due to expire in the next month will be targeted for completion by the individual staff member. In addition, all staff will receive safeguarding and child protection (including online safety) updates via email, staff newsletters, and staff meetings which are minuted. There is also a section within the SharePoint to store all resources related to safeguarding to ensure these are readily available for review and for any new staff that start with the company. This is a mandated action alongside safeguarding training units that is documented on Induction forms, On-Line Safety and Safeguarding training is to be carried out by all staff at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Opportunity for staff to contribute to and shape safeguarding arrangements and the child protection policy and future learning needs of the team is discussed at team meetings and implemented by the Safeguarding Team. All new updates and opportunities for learning are shared and documented at this meeting.

Learner behaviour management is essential to ensure a good and safe educational environment and requires staff to have a clear understanding of the needs of all of our learners. All staff are encouraged to complete CPD in this area of learning, however this is mandatory for all delivery staff.

Also refer to Futures Changing Staff Qualifications, Development and Training Policy.

7. Designated Safeguarding Lead (DSL) – Responsibilities

The Designated Safeguarding Lead (DSL) has overall responsibility for safeguarding and child protection within Futures Changing Ltd. The DSL provides strategic leadership, ensures compliance with statutory duties, and promotes a culture where safeguarding is prioritised throughout the organisation. The DSL is supported by the Deputy DSL(s); however, ultimate accountability remains with the DSL.

Managing Referrals

- Act as the principal point of contact for all safeguarding concerns, disclosures and referrals.

- Make timely referrals to Children's Social Care, Police or the LADO where there is risk of harm, or where staff behaviour meets or may meet the harms threshold.
- Consult with the LADO where there are emerging patterns, borderline cases or concerns about staff conduct.
- Make referrals to the Channel Programme where there are concerns about radicalisation or extremism.
- Ensure all actions, decisions and rationales are clearly and accurately recorded.

Working With Others

- Liaise effectively with Children's Social Care, Police, LADO, ECC authorised representatives, schools and other multi-agency partners.
- Act as the lead link with ECC through the safeguarding platform and renewal service.
- Provide advice, support and guidance to staff on safeguarding matters and reporting processes.
- Promote a whole-organisation approach to safeguarding.

Managing Safeguarding Records

- Maintain secure, compliant and confidential safeguarding records using the organisation's digital safeguarding systems (CPOMS and/or My Concern, as applicable).
- Ensure all concerns, disclosures, chronology, actions and decisions are accurately recorded within CPOMS/My Concern in line with statutory requirements and GDPR.
- Review digital records regularly to identify patterns, escalating concerns or emerging risks.
- Oversee the safe transfer and receipt of safeguarding files via CPOMS/My Concern when learners join or leave the organisation.
- Ensure low-level concerns and allegations are logged and monitored within the system and analysed for patterns.

Raising Awareness

- Ensure the safeguarding policy and procedures are understood, implemented and accessible to all staff.
- Ensure staff are trained and confident in using CPOMS to report concerns promptly and accurately.
- Promote awareness of contextual safeguarding, online harms, SEND vulnerabilities, exploitation and radicalisation.
- Ensure learners know how to report concerns and access support.

Training and Supervision

- Complete DSL-specific training every two years and maintain up-to-date specialist knowledge.
- Deliver annual safeguarding training to all staff and provide in-year updates.
- Ensure staff can recognise concerns, manage disclosures and record them correctly within CPOMS.
- Access appropriate supervision for the DSL role.

Oversight of Filtering and Monitoring

- Review filtering and monitoring reports and respond to alerts or concerning online activity.
- Ensure digital safety systems are effective and appropriate for SEND learners.
- Escalate online safeguarding concerns to external agencies where required.

Monthly Safeguarding Meetings

- Hold monthly safeguarding meetings with Deputy DSL(s), HR and Directors to review:
    - new concerns and open cases,
    - patterns or themes,
    - low-level concerns and allegations,

  - filtering and monitoring data,
  - records within CPOMS/My Concern,
  - emerging risk or practice issues.
- Ensure decisions, actions and rationales are clearly recorded and monitored for follow-up.

Reviewing and Quality Assurance

- Lead safeguarding audits, ECC compliance requirements and practice reviews.
- Evaluate the effectiveness of safeguarding systems including CPOMS/My Concern and implement improvements.
- Support safer recruitment processes and ensure safeguarding checks are fully compliant.

Supporting Learners and Families

- Ensure at-risk learners receive timely and appropriate support, including early help.
- Work collaboratively with families, carers and external agencies to meet identified needs.
- Embed safeguarding considerations across SEND and pastoral support.

8. Staff Recruitment

Futures Changing have a specific policy to set out the expectations of the recruitment process in line with KCSIE 2025 Guidance. The Safer Recruitment policy is to:

• Ensure the best possible staff are recruited based on their merits, abilities, and suitability for the position.

• Ensure job applicants are considered equally and consistently.

• Ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age

• Ensure compliance with all relevant legislation, recommendations, and guidance, including statutory guidance

• Provide guidance on the documents and process to be followed. The Management team are responsible for ensuring that Futures Changing follows recruitment procedures that help to deter, reject, or identify people who might abuse children whether through volunteer or paid employment.

All recruitment panels will have at least one member who has completed Safer Recruitment training. The Safer Recruitment Policy ensures that we do our utmost to employ ‘safe’ staff by following the guidance in 'Keeping Children Safe in Education 2025' together with the local authority and the organisation’s individual procedures

Safer recruitment means that all applicants will:

• complete an application form

• provide two referees, including at least one who can comment on the applicant’s suitability to work with children

• provide evidence of identity and qualifications

• be checked through and registered with the Disclosure and Barring Service as appropriate to their role, (for more information Gov.uk)

9. Designated Safeguarding Role

The Designated Safeguarding Lead (and Deputy / Deputies)
The designated safeguarding lead in our centre has ultimate lead responsibility for safeguarding and child protection. Their role includes managing child protection referrals, working with other agencies, ensuring all

staff are appropriately trained, leading on online safety (including filtering and monitoring standards) and raising awareness of all safeguarding and child protection policies and procedures. They ensure that everyone in centre (including temporary staff, volunteers and contractors) is aware of these procedures and that they are followed at all times. They act as a source of advice and support for other staff (on child protection matters) and ensure that any referrals to Essex Children's Social Care (Children and Families Hub) and / or the Police are made in a timely way and in accordance with current SET procedures. They work with the local authority and the ESCB as required and ensure that information is shared appropriately.

The deputy designated safeguarding lead/leads is/are trained to the same standard as the designated safeguarding lead. If for any reason the designated safeguarding lead is unavailable, the deputy designated safeguarding lead/leads will act in their absence.

All Staff

Everyone at Futures Changing has a responsibility to provide a safe learning environment where our children can learn. All staff are aware of the types of abuse and safeguarding issues that can put children at risk of harm, so we are able to identify children who may need help or protection. We understand that behaviours linked to issues such as drug taking and/or alcohol misuse, missing education and consensual/non-consensual sharing of nudes and semi-nudes images can be signs that children are at risk. In addition, we recognise that any child may benefit from additional help, and all staff members are aware of the local early help process and our role in it.

All staff members are aware of and follow school safeguarding processes (as set out in this policy) and are also aware of how to make a referral to Social Care, if there is a need to do so. Staff understand that, if they have any concerns about a child's welfare, they must act on them immediately and speak with the designated safeguarding lead (or deputy) – we do not assume that others have acted.

Our staff understand that children may not always feel able or know how to tell someone that they are being abused. This may be because they are embarrassed, scared or do not recognise they are experiencing abuse, either at home or out in the community. We understand there are many factors which may impact on our children's welfare and safety, and we also understand safeguarding in the wider context (contextual safeguarding). We recognise that abuse, neglect and safeguarding issues rarely occur in isolation and that, in most cases, multiple issues will overlap.

Our staff will always reassure children who report abuse that they are taken seriously and that they will be supported and kept safe. We will never make a child feel ashamed for reporting abuse, nor make them feel they are causing a problem.

10. Early Help

Early Help means providing support as soon as a problem emerges, at any point in a learner's life. Providing early help is more effective in promoting the welfare of learner than reacting later.

Futures Changing Ltd provide Early Help through:

- Tutors/trainers
- Pastoral Support
- Centre Support
- Centre Managers
- Referral to outside agencies for Early Help and support

This could involve just listening, monitoring or checking in, learning access provision or Individual Health Plans, academic mentoring, home-school liaison, information sharing with subject trainers while respecting confidentiality.

As part of our safeguarding commitment and in line with Working Together to Safeguard Children (2023) and KCSIE (2025), [Organisation Name] recognises that providing early help is essential to addressing concerns

before they escalate into significant harm. Early help means taking action to support a child as soon as difficulties emerge, rather than waiting until a child is at risk of harm.

Staff in our Alternative Provision are trained to be alert to the need for early help, particularly for children who:

Are frequently missing or go missing from education, home, or care.

- Have experienced multiple suspensions, are at risk of permanent exclusion, or are placed within alternative provision or a pupil referral unit.
- Have a parent or carer in custody, or who are otherwise affected by parental offending.
- May be living in households experiencing domestic abuse, substance misuse, or mental health difficulties.
- Display concerning changes in behaviour, engagement, or emotional wellbeing.

Where early help is identified as necessary, our staff will:

- Record concerns clearly on CPOMS and notify the Designated Safeguarding Lead (DSL).
- Work with the child, family, referring school, and relevant agencies to identify needs and appropriate interventions.
- Contribute to early help assessments and plans, ensuring the voice of the child is central.
- Escalate concerns to children's social care if a child's situation does not improve or if the child is at risk of significant harm.

This approach reflects our belief that safeguarding is everyone's responsibility, and that timely, proportionate early intervention can significantly improve outcomes for children and families.

11. What to look out for

At Futures Changing Ltd. we are committed to safeguarding and promoting the welfare of all learners. Learners may be harmed in multiple ways, and abuse can take the form of **physical, sexual, emotional abuse, neglect, or exploitation**. Our staff are trained to recognise the signs of harm and take prompt action in line with statutory guidance.

Abuse, Neglect and Exploitation

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse, neglect or exploit a learner by inflicting harm, failing to act to prevent harm, or exploiting them**.** Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This is particularly relevant when children see, hear or experience domestic abuse and its effects.

Learners may be abused in a family, institutional, or community setting, by adults or other children. Abuse can also occur online or be facilitated through technology.

The following categories of abuse, neglect and exploitation are recognised:

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm. Harm may also occur when a parent or carer fabricates symptoms or deliberately induces illness.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a learner, causing severe and adverse effects on their emotional development. It may involve conveying that a learner is worthless, unloved, or inadequate, or imposing age- or developmentally inappropriate expectations. Emotional abuse may also include:

- Preventing learners from expressing their views or making them feel silenced
- Overprotection or limiting learning and social interaction
- Witnessing the ill-treatment of others
- Serious bullying, including cyberbullying
- Exploitation or corruption

Sexual Abuse

Sexual abuse involves forcing or enticing a learner to take part in sexual activities, whether or not they are aware of what is happening. Activities may include physical contact (e.g., assault by penetration, touching, or kissing) or non-contact activities (e.g., viewing or producing sexual images, grooming online). Sexual abuse can be perpetrated by adults or other learners. Child-on-child sexual abuse is recognised as a specific safeguarding concern in education.

Neglect

Neglect is the persistent failure to meet a learner's basic physical, psychological or emotional needs, likely to result in serious impairment to health or development. Neglect may occur during pregnancy (e.g., maternal substance abuse) or after birth, and may include:

- Failing to provide adequate food, clothing, or shelter
- Failing to protect from harm or danger
- Inadequate supervision or care
- Lack of access to medical care or treatment
- Failing to meet emotional needs

Exploitation

Exploitation occurs when an imbalance of power is used to manipulate or coerce a learner into criminal, sexual, or other harmful activities. This may occur online or offline, by adults or peers. Learners in Alternative Provision may be at heightened risk of exploitation due to prior trauma, disrupted education, or complex personal circumstances.

At Futures Changing Ltd, all staff are trained to recognise these signs, act swiftly, and follow our safeguarding procedures to ensure learners are protected and supported at all times.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, unexplainable and/or persistent absences from education, unexplainable and/or persistent absences from education, serious violence, radicalisation and consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE) Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power, to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE) Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE) CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Domestic Abuse Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM) Whilst all staff should speak to the DSL (or Deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. More information can be found in the mental health and behaviour in school's guidance. If staff have a mental health concern about a child, immediate action should be taken, following the school's policy, and speaking to the DSL or a Deputy.

Child on child abuse All staff should be aware that children can abuse other children (also referred to as peer on-peer abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. Victims of this abuse will likely find the experience distressing, which can affect their progress in school; this can be made worse if the alleged perpetrator(s) attends the same school. All staff should understand, that even if there are no reports in school it does not mean it is not happening; it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse, they should speak to the DSL or a DDSL. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually

abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. Child on child abuse is most likely to include, but may not be limited to;

● Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

● Abuse in intimate personal relationships between (sometimes known as “teenage relationship abuse”)

● Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) ● sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

● Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.

● Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

● Consensual and non-consensual sharing of nude and/or semi-nude images and or videos (also known as sexting or youth produced sexual imagery)

● Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

● Downblowsing, which typically involves the taking a picture of someone’s breasts without their permission for the purpose of sexual gratification, or cause the victim humiliation, distress or alarm. Unlike upskirting there is currently no specific crime for this.

● Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Prevention of radicalisation As of July 2015, the Counterterrorism and Security Act (HMG, 2015) placed a new duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It requires schools to;

● teach a broad and balanced curriculum which promotes spiritual, moral, cultural understanding

● mental and physical development of pupils and prepares them for the opportunities,

● responsibilities and experiences of life and must promote community cohesion

● be safe spaces in which children / young people can understand and discuss sensitive

● topics, including terrorism and the extremist ideas that are part of terrorist ideology,

● and learn how to challenge these ideas

● be mindful of their existing duties to forbid political indoctrination

● and secure a balanced presentation of political issues

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. All Trust schools operate in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate. Where there are concerns about extremism or radicalisation, advice from appropriate agencies will be sought and, if necessary, a referral to Social Care and/or the Channel Panel will be made.

Serious violence All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

Children potentially at greater risk of harm Futures Changing Ltd recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect. Children who need a social worker (Child in Need and Child Protection Plans) Children may need a social worker due to complex safeguarding or welfare needs. Children may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, education, behaviour and mental health.

Futures Changing Ltd will be made aware of the fact a child has a social worker via the referral partner, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes, sharing where appropriate. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and educational settings to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services.

Attendance

In line with Keeping Children Safe in Education (2025) and the statutory guidance Working Together to Improve School Attendance (DfE, 2024), Futures Changing Ltd recognises that regular attendance is a safeguarding matter as well as an educational one. Poor attendance can be an indicator of wider safeguarding concerns, including neglect, abuse, exploitation, or unmet needs.

As an Alternative Provision, we are committed to:

- Maintaining high expectations of attendance for all learners, recognising that consistent attendance supports safety, stability, and achievement.
- Identifying and addressing patterns of poor attendance at the earliest opportunity, including through liaison with families, referring schools, and the local authority.

- Ensuring safeguarding risks linked to non-attendance are assessed and addressed promptly, with concerns recorded on CPOMS and escalated to the Designated Safeguarding Lead (DSL) where appropriate.
- Following the statutory procedures set out in the Working Together to Improve School Attendance guidance, including accurate record-keeping, monitoring, and reporting.

A full statement of our approach and procedures can be found in our Attendance and Abscondence Policy, which should be read alongside this Child Protection Policy & Safeguarding Policy.

Children missing from education Children missing education, particularly persistently, can act as a warning sign to a range of safeguarding issues including neglect, child sexual abuse and child sexual and criminal exploitation. It is important that our response to children missing from education supports identifying such abuse and also helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's safeguarding response to children missing from education. Please see Learner Attendance & Abscondence Policy as an extension to this document. Futures Changing Ltd recognises that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Children with SEN and disabilities, and/or physical health issues can face additional safeguarding challenges, both in terms of their vulnerability and also in terms of being able to report abuse. Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration. Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Children who are LGBTQ+ (Lesbian, Gay, Bisexual, Trans, Queer/Questioning, ACE) The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Children who at Alternative Provision (AP) Placements The cohort of pupils in Alternative Provision often have complex needs and are therefore often have an additional risk of harm. Detailed guidance can be found at Alternative provision - GOV.UK (www.gov.uk) When the school places a pupil with an AP provider the school continues to be responsible for the safeguarding of that pupil. The school will, therefore, show due diligence in the choice of AP providers, which will almost always be on an approved list from County, and will have additional and frequent measures to check the welfare of pupils who are attending. Futures Changing welcomes all school referral partners and commits to working with them transparently and with cohesion for the continued safety of the child in our care.

Online safety the use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm. Futures Changing has had due regard to the additional information and support set out in KCSIE 2025 and ensures that the setting has a whole setting approach to online safety and has a clear policy on use of communications technology in centre. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement. It is essential that children are safeguarded from potentially harmful

and inappropriate online material. Futures Changing adopts a whole setting approach to online safety to protect and educate learners and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate. Futures Changing are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be able to access and be clear who from the school (if anyone) their child is going to be interacting with online. Online safety issues can be categorised into four areas of risk;

● Content being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation or extremism

● Contact being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

● Conduct personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying)

● Commerce risks such as online gambling, inappropriate advertising, phishing and/or financial scams. All staff should be aware of the risks to children online and seek to help children keep themselves safe online in a range of ways.

As part of our commitment to safeguarding, Futures Changing Ltd, in addition, recognises that online risks extend beyond harmful content, contact and conduct, and now include exposure to disinformation, misinformation and conspiracy theories. These forms of online risk can significantly affect children's wellbeing, safety, and ability to make informed choices.

Disinformation refers to the deliberate creation and spreads of false or misleading information. This may include fake news, fabricated stories, or manipulated media designed to influence beliefs, cause harm, or undermine trust.

Misinformation refers to the unintentional sharing of false or misleading information, often where an individual believes it to be true.

Conspiracy theories often draw on both disinformation and misinformation, promoting harmful narratives that may cause distress, encourage unsafe behaviour, or isolate children from trusted sources of support.

We recognise that children and young people are particularly vulnerable to these online risks due to their developing critical thinking skills and the persuasive nature of digital media.

Our organisation will:

Educate children and young people about identifying and questioning online content that may be false or misleading.

Equip staff with up-to-date training on emerging online risks, including disinformation and misinformation.

Promote the use of trusted, credible sources of information and encourage healthy online behaviours.

Provide a safe space for children to discuss concerns they may have about online content, including conspiracy theories.

Work with parents, carers and external partners to support children in navigating online spaces safely.

This approach aligns with Keeping Children Safe in Education (2025), which highlights disinformation, misinformation and conspiracy theories as key online content risks that schools, colleges and organisations must actively safeguard against.

Filtering and Monitoring Arrangements

Futures Changing Ltd is committed to ensuring that all learners and staff are protected from inappropriate, harmful, or illegal online content. In accordance with KCSIE 2025, the Prevent Duty (2015), and the UK Safer Internet Centre guidance, we maintain robust filtering and monitoring systems across all digital platforms, devices, and internet access points used within our provision.

Filtering Controls

Our filtering systems are designed to:

- Block access to illegal content, including extremist and terrorist material.
- Restrict access to inappropriate or harmful categories (e.g., pornography, violence, drugs, gambling, hate content).
- Provide age-appropriate filtering for SEND learners, taking into account individual vulnerabilities.
- Prevent circumvention (e.g., proxy servers, VPNs) where possible.
- Be reviewed regularly to ensure effectiveness and compliance.

Filtering settings are configured and maintained via our ICT provider to ensure the highest level of security, with adjustments made where individual learner needs require tailored access.

Monitoring Arrangements

We operate a layered monitoring approach that includes:

- Real-time monitoring alerts for attempts to access blocked or concerning content.
- Oversight of search terms, browsing behaviour, and user activity on company devices and platforms.
- Human monitoring through staff supervision during ICT use, particularly for vulnerable learners and those with SEND.
- Reporting processes that escalate any concerning activity to the Designated Safeguarding Lead (DSL) without delay.

All monitoring activity is proportionate, GDPR-compliant, and aligned to safeguarding risk.

Roles and Responsibilities

- The DSL has overall responsibility for reviewing filtering and monitoring reports, responding to alerts, and ensuring safeguarding actions are taken where required.
- The Senior Leadership Team oversees the adequacy and effectiveness of ICT safety measures.
- Staff are required to supervise learners appropriately when accessing digital technologies and to report any concerns immediately.

Review and Auditing

Filtering and monitoring arrangements are:

- Reviewed at least annually or upon significant changes to technology or risk.
- Evaluated following any safeguarding incident involving online behaviour.
- Included as part of the organisation’s safeguarding audit and ECC compliance requirements.

Education and Awareness

Learners receive regular guidance on safe and appropriate online use as part of our curriculum, including digital citizenship, online risks, and reporting routes.

Generative AI

In line with Keeping Children Safe in Education (2025) and the DfE guidance Generative AI: Product Safety Expectations, Changing Futures recognises both the opportunities and risks of generative artificial intelligence (AI).

While AI tools can support learning and creativity, they may also expose learners and staff to unsafe or misleading material. Our approach is to:

Ensure that the use of AI complies with DfE filtering and monitoring requirements.

Prohibit the input of confidential, personal, or safeguarding-related data into AI platforms.

Provide training for staff on safe and responsible AI use.

Educate learners on critically evaluating AI-generated material and understanding potential risks.

Keep the use of generative AI under review, with oversight by the Designated Safeguarding Lead (DSL).

These measures aim to ensure that generative AI supports education while protecting children from harm.

12. Visitors, External Parties and Centre Tours

In line with Keeping Children Safe in Education, Futures Changing Ltd recognises that the welfare and safety of children and young people is paramount at all times.

This section applies to all visitors**,** including:

- External professionals and agencies
- Contractors and maintenance staff
- Volunteers and external speakers
- Parents/carers and members of the public
- Prospective learners and families attending centre tours, taster sessions or open events

Visitor Procedures

All visitors must:

- Report to reception on arrival
- Pre plan their visit with the Centre Manager whenever possible
- Sign in and out using the visitor register
- Wear a visible visitor badge at all times
- Comply with safeguarding expectations while on site

Safeguarding Information

Visitors are made aware of:

- The Centre’s safeguarding responsibilities
- How to report a safeguarding concern
- The identity of the Designated Safeguarding Lead (DSL) or Deputy DSL

Safeguarding information is provided through signage, written guidance, or verbal briefing. Centre tours are documented on Centre Tour & Visitor Declaration Form that details safeguarding information.

Supervision and Access to Learners

- Visitors must not be left alone with learners unless appropriate safeguarding checks have been completed and verified

- Visitors without safeguarding clearance are supervised at all times
- Access is restricted to authorised areas only

DBS and Suitability Checks

- Visitors engaged in regulated activity or working directly with learners on a regular basis must provide evidence of appropriate safeguarding checks, including DBS clearance, where required
- For one-off visitors, parents/carers and members of the public (including centre tours), DBS checks are not required; instead, a risk-assessed supervision model is applied as detailed within the Centre Safeguarding Risk Assessment.

Centre Tours and Prospective Learners

During centre tours and open events:

- Visits are staff-led and fully supervised and should be planned in advance where practical
- Learner visits should be carried out with a school or parental representative
- Visitors are not permitted to move unaccompanied around the Centre
- Routes are planned to minimise disruption and safeguard current learners
- Visitors are advised of behaviour expectations and safeguarding boundaries
- A visitor sign in and out record is maintained alongside written record of the site visit.

Photography, Recording and Mobile Phones

- Visitors must not take photographs, videos or audio recordings of learners without prior consent
- Mobile phone use is monitored where learners are present
- Any breach may result in the visit being terminated

Safeguarding Concerns Involving Visitors

- Any safeguarding concern raised by or relating to a visitor must be reported immediately to the DSL or Deputy DSL
- Allegations involving visitors are managed in line with the Centre's safeguarding and allegations procedures

Responsibilities

- The Centre Director has overall responsibility for visitor safeguarding arrangements
- Staff hosting visitors are responsible for ensuring procedures are followed
- All visitors are expected to comply fully with safeguarding requirements

13. Supporting Learners in the Court System

At Futures Changing Ltd we recognise that some learners may be involved in the youth or family court system. For learners aged 12 and above, we follow the guidance provided by the HM Courts and Tribunals Service (2017b) to ensure that their safeguarding, welfare, and educational needs are met.

This means that we:

- Support learners to understand and engage with court processes in an age-appropriate way.
- Collaborate with legal professionals, social workers, and families to ensure the learner's rights and welfare are protected.
- Maintain confidentiality and data protection, while sharing information with relevant professionals where necessary for safeguarding purposes.
- Provide additional emotional and pastoral support to help learners manage the stress or impact of court involvement on their education and wellbeing.

Our approach ensures that learners involved in the court system receive consistent support, guidance, and safeguarding oversight while continuing their education at Futures Changing Ltd.

14. Data Protection and Information Management

At Futures Changing Ltd we are committed to ensuring that learners' personal information is handled securely, lawfully, and in line with statutory guidance. In accordance with the DfE Data Protection Guidance for Schools (2024b), all staff, governors, and trustees must understand their responsibilities regarding the collection, storage, and use of personal data.

This includes:

- Compliance with data protection law, including the UK GDPR and Data Protection Act 2018
- Developing and maintaining clear data policies for staff, learners, and parents/carers
- Understanding what personal data to keep, for how long, and how to store it securely
- Preventing personal data breaches, and reporting any incidents promptly in line with organisational procedures

Staff receive training on data protection responsibilities and are expected to handle all learner and staff information with confidentiality and integrity, balancing privacy rights with safeguarding obligations.

(Source: Keeping Children Safe in Education 2025 – DfE; DfE Data Protection Guidance for Schools, 2024b)the threshold has been met, they will contact the consultation line otherwise a referral may be made.

Record-Keeping and Decision Rationale

- At Futures Changing Ltd, we recognise that accurate and detailed records are essential to effective safeguarding. In line with KCSIE 2025 guidance:
- All concerns, discussions, and decisions relating to safeguarding must be clearly documented.
- Designated Safeguarding Leads (DSLs) are responsible for maintaining these records and recording the rationale for any decisions made regarding a learner's welfare or safeguarding interventions.
- Records should be timely, factual, and professional, ensuring that they provide a clear audit trail of actions and decisions taken.
- All records must be stored securely, in accordance with data protection legislation, and shared only with relevant professionals on a need-to-know basis.

This approach ensures that our safeguarding practices are transparent, accountable, and compliant with statutory guidance.

Records, Procedures and Confidentiality Well-kept records are essential to good child protection practice. Futures Changing is clear about the need to record any concern held about a child or children within the setting and when these records should be shared with other agencies. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing information where there are real safeguarding concerns. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetrated by a parent or carer. Staff will have regard to the Government guidance: Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers which supports staff who have to make decisions about sharing information. The school uses an online system in recording all aspects of Safeguarding. If supply staff or visitors notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue, they should record their concerns on a centre recording form for safeguarding concerns and pass it to the

DSL without delay. When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, considering any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached. If the DSL is unsure whether Data Protection and Information Management

Safeguarding Record-Keeping and Use of CPOMS

Futures Changing Ltd is committed to maintaining the highest standards of safeguarding for all learners. To ensure that concerns, incidents, and welfare matters are recorded, monitored, and acted upon promptly, we use CPOMS, a secure safeguarding management system.

Purpose of CPOMS

CPOMS enables staff to record and manage all safeguarding concerns in a consistent, secure, and auditable way. It supports early identification of risks, enables effective monitoring, and ensures the rationale for decisions is clearly documented.

Learner Information

All relevant learner details are recorded, including:

- Full name, date of birth, year group, and assigned key staff (tutor).
- School or referral partner

Categories of Concern

Staff must record incidents or concerns in CPOMS under the following categories, aligned with Keeping Children Safe in Education 2025:

Abuse, Neglect, and Exploitation

Physical, emotional, sexual abuse, neglect, and exposure to the ill-treatment of others.

Child-on-child abuse, including sexual harassment and exploitation.

Online Safety

Cyberbullying.

Exposure to disinformation, misinformation, or conspiracy theories.

Risks associated with Generative AI, including unsafe content or AI-facilitated grooming.

Early Help / Risk Indicators

Missing from education, home, or care.

Multiple suspensions or risk of permanent exclusion.

Parental incarceration or offending.

Additional vulnerabilities, including SEND, mental health concerns, or family breakdown.

Recording Actions

For each concern, staff must record:

- Conversations with learners, staff, or parents/carers.
- Referrals to external agencies (social services, CAMHS, police, etc.).
- Decisions made and the rationale behind them.
- Outcomes and any changes to support plans.

Monitoring and Review

CPOMS is used to schedule reviews and follow-up actions.

The system is regularly reviewed to ensure they remain safe and meet learner needs. Audit opportunities to be carried out as part of the monthly safeguarding meeting.

High-risk concerns trigger immediate alerts to the Designated Safeguarding Lead (DSL).

Documentation and Evidence

Supporting documentation may be uploaded to CPOMS, including:

- Written confirmation of safeguarding checks from alternative providers.
- Court documents for learners involved with the justice system.
- Any emails, reports, or other relevant evidence.

Confidential Professional Notes

DSLs may record confidential professional judgments or observations that may not yet require formal action but are important for monitoring trends.

Staff Responsibilities

All staff are responsible for:

- Recording concerns promptly and accurately.
- Using CPOMS in line with company procedures and data protection guidance.
- Supporting the DSL and other agencies following any referral.

This system ensures that all safeguarding concerns are recorded, monitored, and addressed consistently, supporting our commitment to the safety and welfare of every learner in our alternative provision setting.

15. Reporting a Concern

Safeguarding Reporting Flowchart

Step 1 – Staff/Volunteer Identifies Concern

- Observation, disclosure, or allegation of abuse, neglect, or other safeguarding concern.

Step 2 – Immediate Action

- If the child is in immediate danger, contact emergency services (999).
- Ensure the child is safe and supported.

Step 3 – Report to DSL

- Record concern in CPOMS (or paper record if system unavailable).
- Notify the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.

Step 4 – DSL Assessment

- DSL reviews concern, checks history, and determines next steps:
    - **Low-level concern:** manage internally, record, monitor for patterns.
    - **Potential harm / threshold met:** refer to Children's Social Care, LADO, or other external agencies as required.
    - **Prevent/Channel concern:** refer to Channel Panel.
    - All ECC referrals must be recorded on My Concern platform by DSL/DDSL

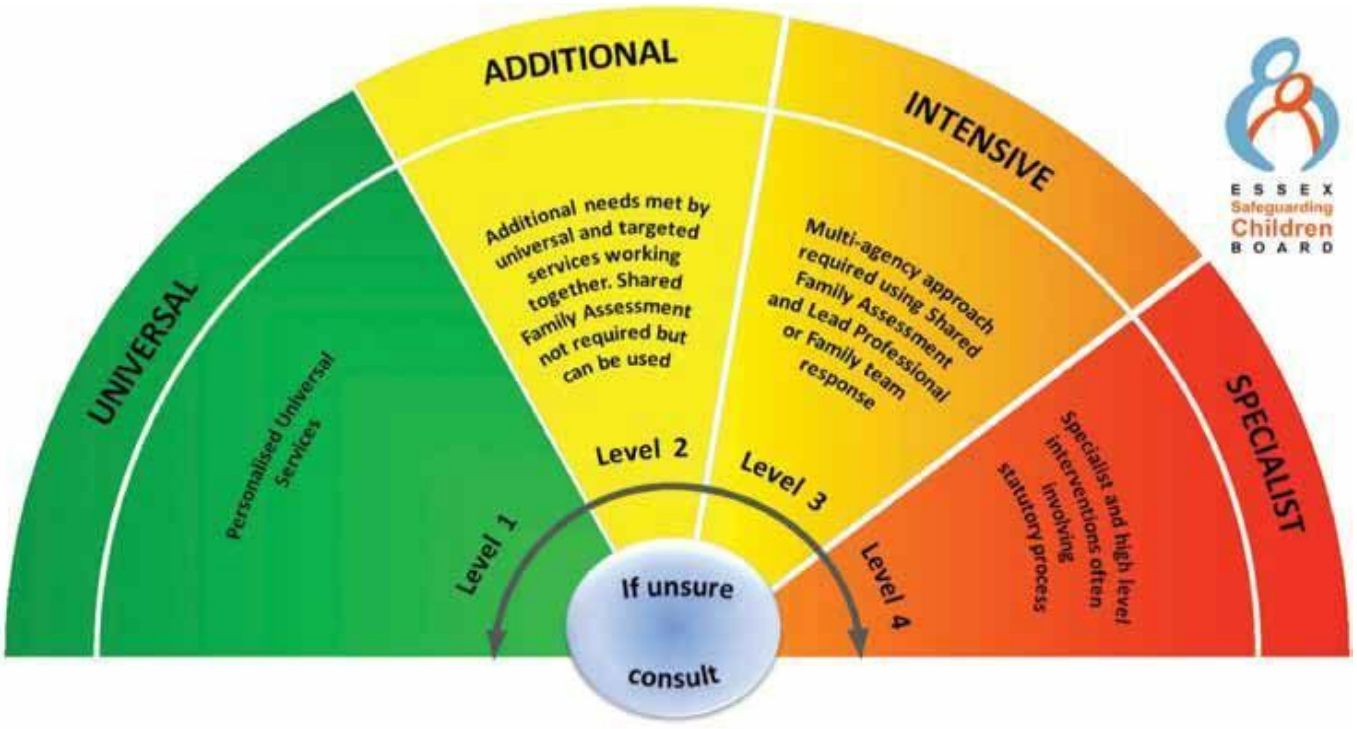
Step 5 – Escalation and Action

- DSL liaises with external agencies, commissioning school, parents/carers, or safeguarding partners as required.
- DSL monitors action ensures chronology and rationale recorded in CPOMS/My Concern.

Step 6 – Follow-Up

- Monitor outcomes, provide support to child and staff as needed.
- Review placement, risk, or low-level concern trends in monthly safeguarding meetings.

Essex Windscreen of Need and levels of intervention



All partners working with children, young people and their families will offer support as soon as we are aware of any additional needs. We will always seek to work together to provide support to children, young people and their families at the lowest level possible in accordance with their needs.

Children with **Additional** needs are best supported by those who already work with them, such as Family Hubs or schools, organising additional support with local partners as needed. When an agency is supporting

these children, an Early Help Plan and a Lead Professional are helpful to share information and co-ordinate work alongside the child and family.

For children whose needs are **Intensive**, a coordinated multi-disciplinary approach is usually best, involving either an Early Help Plan or a Shared Family Assessment (SFA), with a Lead Professional to work closely with the child and family to ensure they receive all the support they require. Examples of intensive services are children's mental health services and Family Solutions.

Specialist services are where the needs of the child are so great that statutory and/or specialist intervention is required to keep them safe or to ensure their continued development. Examples of specialist services are Children's Social Care or Youth Offending Service. By working together effectively with children that have additional needs and by providing coordinated multi-disciplinary/agency support and services for those with intensive needs, we seek to prevent more children and young people requiring statutory interventions and reactive specialist services.

If you have a concern about a learner's wellbeing, based on:

- A concern or worry about a learner or their parent has shared with you
- something you have noticed about the learner's behaviour, health, or
- appearance, i.e. something that may indicate abuse, self-harm or neglect
- An allegation is made
- A learner displays concerning behaviour or produces concerning coursework.

Pass all concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL if they are not available.

Even if you think your concern is minor, the Designated Safeguarding Lead (DSL) may have more information that, together with what you know, represents a more serious worry about a student. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

Do not investigate but decide whether you need to clarify your concerns by asking the student or parent open questions (beginning with words like who, how, why, what, where and when) and being careful not to lead them.

Clarify concerns using, if necessary, TED: Tell, Explain, Describe. Do not ask leading questions or make judgements.

Do not promise confidentiality or to keep a secret. Do not discuss your concerns with the parent/carer(s) if this may increase the risk to the learner.

If you have heard a disclosure of abuse or are talking with a learner or parent/carer about your concerns, let them know what you will do next. For example, 'I am worried about ….. and I need to tell …….. so that they can help us think about how to keep you safe.'

Inform the DSL immediately. If the DSL is not available, inform a Deputy DSL. Names and photos are given at the start of these procedures. If none of the Designated Safeguarding staff or are available, you must make the referral yourself.

As soon as possible after the event, make a written record using the Record of Concern forms. Use a body map to record sign or indicators of abuse or self-harm if appropriate.

If there was a disclosure, record the words of the learner or parent/carer rather than your interpretation. Record what you saw or heard and why it is a cause for concern.

For all safeguarding concerns staff must without delay inform the DSL in person or by telephone, or one of the Deputy DSLs if DSL not available, as well as completing a Record of Concern Form.

16. Responding to a concern

On receipt of the concern the DSL will:

Consider whether the learner is at immediate risk of harm, e.g., mental health crisis, unsafe to go home.

- Speak to the learner concerned – the voice of the student is important
- Speak to other learners, staff, parents if appropriate
- Formulate a plan or strategy for in-centre support, if appropriate
- Consult with and refer to other agencies, e.g., Local Authority Children's Social Care, Mental Health Services, Local Authority Designated Officer (for workforce allegations), etc., and formulate an agreed course of action and support plan.
- Feedback to the person reporting the concern

The DSL will feedback to the person reporting the concern when they are able to do so, whilst maintaining confidentiality. The DSL will record all decision-making (including who confidential information has been shared with and why) and record actions taken in the student's safeguarding file. Centre Managers also be asked to complete and record follow up actions. All follow ups, meeting notes and any further concerns including about the procedure, raised by staff, learners or parents/carers will also be recorded, with any subsequent actions.

Key numbers for referrals In Essex

Essex Safeguarding Consultation Line – 0345 603 7627 or 0345 606 1212 (out of hours)

Concerns about the welfare of a child Where a safeguarding concern does not meet the threshold, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help. Staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. Futures Changing is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of any meeting in accordance with procedures and timescales. Where reasonably possible, Futures Changing is committed to obtaining more than one emergency contact number for each pupil. We recognise that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or Deputy DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so. Futures Changing will have regard to guidance for schools on maintaining and transferring pupil safeguarding/child protection records. When a child leaves the setting, the DSL will ensure their child protection file is transferred to their new school or setting as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Allegations made against or concerns raised in relation to tutors, other staff, volunteers and contractors Futures Changing will follow the Local Authority arrangements for Managing Allegations of abuse against people who work with children or those who are in a position of trust if an allegation is made against an adult in a position of trust.

An allegation is any information which indicates that a member of staff /volunteer may have;

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

This applies to any child the member of staff, staff member, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our setting. If any member of staff has concerns that a colleague, volunteer or contractor might pose a risk to children, it is their duty to report these to the Designated Safeguarding Lead. Where the concerns or allegations are about the DSL, these should be referred to the Deputy.

Where an allegation against a member of staff is received, the DSL, senior named person must inform the duty Local Authority Designated Officer **(LADO) (Essex it is 03330 139 797)** within one working day.

However, wherever possible, contact with the LADO will be made immediately as they will then advise on how to proceed and whether the matter requires Police involvement. This will include advice on speaking to pupils and parents, and HR. Futures Changing does not carry out any investigation before speaking to the LADO. Staffing matters are confidential, and Futures Changing operates within a statutory framework around Data Protection. The statutory guidance Keeping Children Safe in Education (KCSIE) 2025 includes guidance for schools on dealing with low-level concerns about the behaviour of teachers, support staff, volunteers and contractors. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a "nagging doubt" - that an adult working in or on behalf of the school may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to;

- ● being over friendly with children
- ● having favourites
- ● taking photographs of children on their mobile phone
- ● engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- ● humiliating pupils.

If a low-level concern or allegation is raised, the DSL should collect as much evidence as possible by speaking directly to the person who raised the concern unless it has been raised anonymously and speak to the individual to whom the concern relates, and any witnesses. At this stage, advice should also be taken from HR to determine whether any management action (such as training, coaching, and/or disciplinary action) may be appropriate. Low-level concerns about a contractor should be reported to their employer, so any potential patterns of inappropriate behaviour can be identified and dealt with accordingly. Where there is no employer (e.g. some voluntary workers may not have an employer) the DSL should take HR advice and agree appropriate next steps, considering this written advice. Incidents of any low-level concerns and/or allegations should be recorded by the DSL on the Staff Safeguarding Concern Form. The form should include a written summary of the low-level concern or allegation including contextual information (with dates), actions that have been taken to respond to the concerns, confirmation that the individual to whom the concern relates has been spoken to, and when, and their response, and the final outcome. The name of the individual sharing their concerns should also be noted. If the individual raising the concern wishes to remain anonymous, this should be respected as far as is reasonably possible. Again, the DSL may wish to seek advice from HR on this matter. Upon completion, the form must be signed and dated by the DSL and shared with HR via email, for inclusion in the employee's HR file. The school will retain the record on the employee's file until the individual leaves their employment. All such records will be held confidentially, and in line with the company's data retention policy.

Low-level concerns and allegation records are reviewed regularly by the DSL, HR and Directors to identify any patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the DSL and HR will discuss and agree the appropriate course of action, which may include management guidance, additional training, supervision, or formal action under the disciplinary procedures. Where behaviour escalates or begins to meet, or is likely to meet, the harms threshold, the organisation will consult with or refer to the LADO without delay. All decisions, actions taken and the rationale for them will be clearly recorded.

17. If you are unhappy with the response

Staff:

- Consult with DSL, DDSL, Senior Leader

- Follow the Futures Changing escalation procedures including reporting the concern yourself to the Local Authority
- Follow the Whistleblowing Procedures.

DSL:

- Review actions taken
- Re-refer and request further agency support
- Review any other intervention strategies e.g. parents/carers accessing mental health services
- Consult with the Local Authority Designated Officer for further advice (for workforce allegations only).

Learners and Parents/carers:

- Speak to the DSL
- Inform the Centre Manager
- Raise a concern following the Complaints Procedures
-

18. Anonymous reporting

Futures Changing Ltd. has an email address available for concerns to be raised anonymously via safeguarding@changefutures.co.uk ; access to this inbox is available to the DSL and Deputy only.

19. Whistleblowing

If you are concerned about poor or unsafe practice or potential failures in Futures Changing Ltd.'s safeguarding regime, this should be raised with the Designated Safeguarding Lead, in the first instance.

Procedure for raising concerns

Concerns about malpractice should be raised at the earliest opportunity with your line manager or a member of the Centre Management Team. Concerns are best raised in writing, setting out the background, history and reasons for the concern, giving names, dates and places where possible. If you feel unable to put your concern in writing, you can telephone or meet the appropriate person, and a note of your concern will be made.
If you raise a concern and do not want your name to be disclosed to the perpetrator of the alleged malpractice, the person(s) with whom you raise the concern will not do so without your prior approval. You should appreciate that if the investigation process is to be carried forward effectively, your identity may have to be revealed and a statement by you may be required as part of the evidence.

The Centres Response
The action taken by the Centre will depend upon the type of concern. The matters raised may be investigated internally, reported to the police (this will normally be the case if criminal activity is suspected), the internal or financial statements auditors, or the Skills Funding Agency. Or any combination of the above.

Initial enquiries will be made promptly to decide whether an investigation is appropriate and, if so, what form it should take. Concerns which fall within the scope of specific procedures (for example, harassment or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of your concern being received, you will normally receive a written acknowledgement, sent to your home address. Thereafter, while it is not possible to stipulate specific timescales due to the nature of investigations of this type, you will be kept generally informed on how the matter is to be dealt with and the progress and outcome of the investigation.

The amount of contact between the person(s) considering your concerns and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from you.

Please also refer to the company Whistleblowing Policy

The NSPCC whistleblowing helpline is available for those who do not feel able to raise concerns regarding child protection failures internally. The contact number is 0800 028 0285. This line is available from 8:00 to 20:00, Monday to Friday or email: help@nspcc.org.uk.

20. Reviewing these procedures

These procedures are reviewed at least annually and approved by the Managing Director. Copies of these procedures and supporting materials, such as Keeping Children Safe in Education (Department for Education, September 2025), are available on the shared drive. Hard copies may be requested from the Quality team.

21. Safeguarding code of behaviour and conduct

Futures Changing recognise that it is not practical to provide definitive instructions that wouldalways apply to all situations whereby staff encounter young people and vulnerable adults, and to guarantee the protection of young people, vulnerable adults and staff. However, the appended Safeguarding Code of Conduct sets out the standards of behavior required of staff to fulfil their roles within Futures Changing. This code should assist in the protection of children, vulnerable adults and members of staff, and should be fully understood by all staff. The code applies to all staff including unpaid volunteers and apprentices working at Futures Changing.

22. Key Contacts

Designated Safeguarding Lead (DSL)

Name	Email	Contact Number
Loren Janes	Loren@changefutures.co.uk	07596883077

Designated Safeguarding Deputy

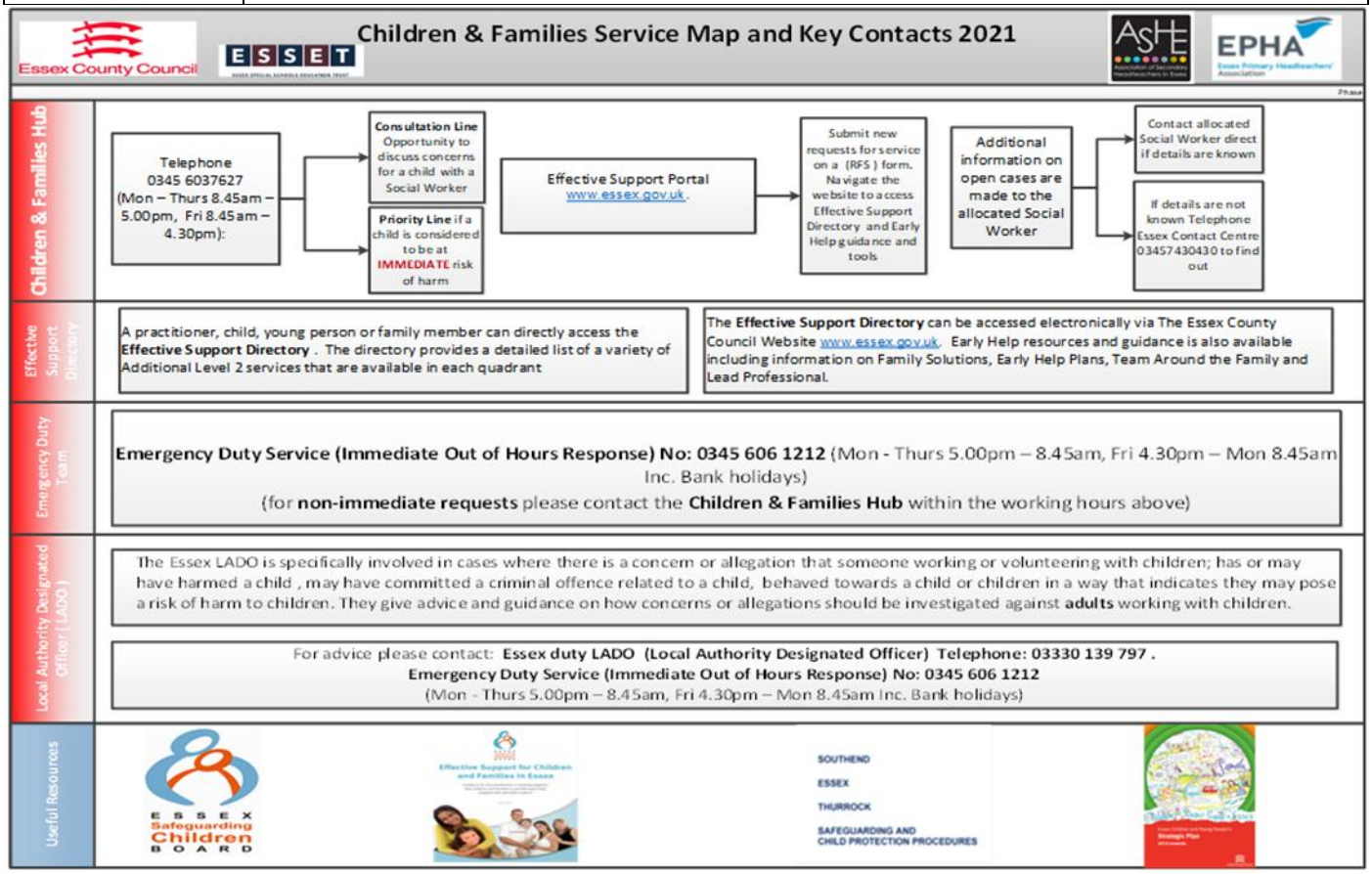
Name	Email	Contact Number
Charlotte Manford	Charlotte@changefutures.co.uk	07749339610

Safeguarding – local area designated officers (LADO)

County	Local Authority Designated Officers Local Authority Designated Officers
Colchester	LADO – The Local Authority Designated Officer role is based at County Hall, Market Rod, Chelmsford, CM1 1QH Telephone: **03330 139 797** Email: lado@essex.gov.uk

Children's Family Hub (Missing Students or in the event of immediate danger)

County	Local Authority Designated Officers Local Authority Designated Officers
Colchester	03466037627


Children & Families Service Map and Key Contacts 2021
Essex County Council
ESSET
ASHE
EPHA
Children & Families Hub
Telephone 0345 6037627 (Mon – Thurs 8.45am – 5.00pm, Fri 8.45am – 4.30pm):
Consultation Line Opportunity to discuss concerns for a child with a Social Worker
Priority Line if a child is considered to be at IMMEDIATE risk of harm
Effective Support Portal www.essex.gov.uk.
Submit new requests for service on a (RFS) form. Navigate the website to access Effective Support Directory and Early Help guidance and tools
Additional information on open cases are made to the allocated Social Worker
Contact allocated Social Worker direct if details are known
If details are not known Telephone Essex Contact Centre 03457430430 to find out
Effective Support Directory
A practitioner, child, young person or family member can directly access the Effective Support Directory. The directory provides a detailed list of a variety of Additional Level 2 services that are available in each quadrant
The Effective Support Directory can be accessed electronically via The Essex County Council Website www.essex.gov.uk. Early Help resources and guidance is also available including information on Family Solutions, Early Help Plans, Team Around the Family and Lead Professional.
Emergency Duty Team
Emergency Duty Service (Immediate Out of Hours Response) No: 0345 606 1212 (Mon - Thurs 5.00pm – 8.45am, Fri 4.30pm – Mon 8.45am Inc. Bank holidays)
(for non-immediate requests please contact the Children & Families Hub within the working hours above)
Local Authority Designated officer (LADO)
The Essex LADO is specifically involved in cases where there is a concern or allegation that someone working or volunteering with children; has or may have harmed a child, may have committed a criminal offence related to a child, behaved towards a child or children in a way that indicates they may pose a risk of harm to children. They give advice and guidance on how concerns or allegations should be investigated against adults working with children.
For advice please contact: Essex duty LADO (Local Authority Designated Officer) Telephone: 03330 139 797.
Emergency Duty Service (Immediate Out of Hours Response) No: 0345 606 1212
(Mon - Thurs 5.00pm – 8.45am, Fri 4.30pm – Mon 8.45am Inc. Bank holidays)
Useful Resources
ESSEX Safeguarding Children BOARD
Effective Support for Children and Families in Essex
SOUTHEND
ESSEX
THURROCK
SAFEGUARDING AND CHILD PROTECTION PROCEDURES

Centre Address:	Grange Way, Colchester, CO2 8HF	**Review and Storage:** Completed versions of this risk assessment and any associated review notes must be securely stored (both electronically and in hard copy) for a minimum of **three years** from the date of review. Electronic versions are held on the Centre's SharePoint with restricted access to authorised staff only.
Completed By:	Charlotte Manford	
Date Completed:	19th May 2026	
Next Review Date:	19th May 2027	

Hazard / Risk	Who Might Be Harmed	Potential Consequences	Existing Control Measures	Additional Controls / Actions Required	Risk Rating (LxS)	Responsible Person	Review Date
Safeguarding & Learner Welfare	Learners, especially under 18s and vulnerable adults	Emotional harm, neglect, abuse, bullying	Safeguarding Policy in place; DSL identified; all staff DBS checked; clear reporting procedure; learner induction covers safeguarding; visitor policy enforced	Regular safeguarding training; termly review of individual learner risk profiles; ensure contact details for DSL displayed	**M (3x2=6)**	DSL / Centre Manager	Termly
Inappropriate behaviour / bullying (peer-on-peer)	Learners	Emotional distress, withdrawal, impact on learning	Behaviour policy; clear code of conduct; supervision in communal areas; incident reporting procedure	Anti-bullying workshops; encourage reporting; record and monitor incidents	**M (3x2=6)**	Tutors / DSL	Termly
Mental health / Emotional wellbeing	Learners, especially vulnerable	Stress, anxiety, non-attendance	Wellbeing policy; student support; signposting to external agencies	Promote mental health awareness sessions; staff MHFA training	**M (3x2=6)**	DSL	Termly
Online safety / inappropriate digital use	Learners	Cyberbullying, exposure to harmful content E-Safety Policy	Acceptable Use Policy; supervised computer access; safeguarding monitoring	Provide e-safety awareness lessons; update acceptable use annually.	**L (2x2=4)**	DSL	Annual
Visitors / contractors on site	Learners, staff	Safeguarding breach, injury	Visitor sign-in process; supervised access; DBS required where relevant – External Speaker Policy. Pre booked visits encouraged through all external agencies.	Review contractor safeguarding checks annually	**M (2x2=4)**	Centre Manager	Annual
Child-on-child sexual harassment or violence	Learners	Emotional harm, trauma, distress, withdrawal from learning	Clear reporting procedure; staff training on managing disclosures; code of conduct and behaviour policy; supervision in social areas	Deliver awareness sessions; ensure immediate support plan and referral to DSL; record on safeguarding log; liaise with external agencies where needed	H (3x3=9)	DSL / Safeguarding Team	Termly
Allegations against staff or volunteers	Learners, staff, volunteers	Loss of trust, harm to learner, reputational damage	Allegations policy in place; all staff aware of LADO referral process; DSL and Centre Manager trained in managing allegations	Annual policy review; maintain record of all allegations and outcomes; reinforce whistleblowing procedure	H (3x3=9)	Centre Manager / DSL	Annual
Exposure to Radicalisation or extremist views (Prevent Duty)	Learners, staff	Influence by extremist ideologies, behavioral changes, reputational risk	Prevent Policy; Prevent training completed by all staff; monitoring of learner behaviour and external speakers; IT filters in place	Refresh Prevent awareness each year; record any referrals to Channel; review external visitor policy	M (3x2=6)	Prevent Lead / DSL	Annual
Child Criminal Exploitation (CCE) / Child Sexual Exploitation (CSE)	Learners, especially vulnerable or those at risk of exclusion	Grooming, coercion, abuse, risk-taking behaviour, missing from education	Safeguarding and exploitation awareness training; referral pathways to MASH; monitoring of attendance and behaviour changes	Include exploitation awareness in wellbeing and careers sessions; maintain partnership with local safeguarding agencies	H (3x3=9)	DSL / Pastoral Lead	Termly

Hazard / Risk	Who Might Be Harmed	Potential Consequences	Existing Control Measures	Additional Controls / Actions Required	Risk Rating (LxS)	Responsible Person	Review Date
Attendance and Missing from Education	Learners	Loss of learning, increased vulnerability, potential safeguarding concern	Daily attendance register; DSL oversight of persistent absence; welfare checks for non-attendance. Reporting to EEC and Schools where applicable	Automated attendance alerts; early intervention through learner welfare meetings; report to LA if missing 5 consecutive sessions.	M (3x2=6)	Attendance Officer / DSL	Termly
Information sharing and confidentiality breaches	Learners, staff	Breach of privacy, loss of trust, GDPR violation	Secure electronic record systems; restricted access; information sharing policy aligned with KCSIE 25 and GDPR	Annual data protection refresher; audit of safeguarding records; ensure safe password practices	M (2x3=6)	DSL & Head of Compliance	Annual
Use of technology / images / social media	Learners, staff	Inappropriate image sharing, safeguarding breach, reputational risk	Acceptable Use Policy; photography consent forms; supervision of device use; social media policy in place	Review acceptable use annually; digital safety training for learners; ensure online reporting mechanisms are active	M (2x3=6)	DSL & Head of Compliance	Annual
Physical intervention or restraint (if applicable)	Learners, staff	Physical or emotional harm, complaint, injury	Behaviour management and de-escalation training; only trained staff to use physical intervention; incident reporting procedure	Annual refresher training; review incidents for learning; ensure parental communication after any use of restraint	M (2x3=6)	Centre Manager / DSL	Annual
Safeguarding in work placements	Learners placed with employers or external providers	Exposure to unsafe environments, inadequate supervision, abuse	Employer safeguarding checks; signed agreement confirming compliance with safeguarding and H&S; periodic site visits	Annual employer audits; ensure all external providers complete safeguarding declarations; immediate reporting of concerns	M (3x2=6)	Employer Liaison Officer / DSL	Annual
Learner visits prior to enrolment (taster days, interviews, tours, assessments)	Prospective learners (especially under 18s and vulnerable adults), staff	Safeguarding breach, lack of supervision, inappropriate contact, injury, unmet additional needs	Visitor sign-in process; supervised visits; staff present are DBS checked; safeguarding information available on site; visitor badges worn	Named staff lead for visit; visitor safeguarding briefing; record of attendance and concerns; immediate DSL escalation procedure. Completion of Centre Tour & Visit Declaration Form to be completed.	M (3x2=6)	Centre Manager / DSL/ Staff rep carrying out the tour.	Termly
Artificial Intelligence (AI) misuse and emerging technologies	Learners	Grooming, coercion, image abuse, emotional harm	Acceptable Use Policy; online safety monitoring; staff awareness of online risks	Update policies to include AI risks; learner awareness sessions on AI misuse and consent; staff training on recognising AI-enabled safeguarding concerns	M (3x2=6)	DSL / Head of Compliance	Annual
Sexual image abuse / sextortion (including deepfakes)	Learners	Trauma, coercion, emotional distress, reputational harm	Online safety procedures; reporting routes; DSL oversight	Clear response protocol; immediate DSL escalation; police/CEOP referral where appropriate; trauma-informed support; record on safeguarding system	H (3x3=9)	DSL	Termly
Contextual safeguarding (community and peer-group risks)	Learners, especially vulnerable	Criminal exploitation, gang involvement, missing episodes	Attendance monitoring; behaviour tracking; multi-agency links	Contextual risk assessments; information sharing with local agencies; targeted interventions based on local intelligence	H (3x3=9)	DSL / Tutors	Termly
Online influencers and harmful ideologies	Learners	Normalisation of violence, misogyny, extremism, exploitation	Prevent Policy; staff vigilance; curriculum discussions	Media literacy and critical thinking sessions; staff training on indicators; integrate into Prevent and wellbeing programmes	M (3x2=6)	DSL	Annual
Neurodiversity and SEND safeguarding risks	Learners with SEND / neurodivergent learners	Missed disclosures, increased vulnerability to exploitation	Individual support plans; staff awareness of learner needs	Training on neurodivergent disclosures; adjusted communication approaches; personalised safeguarding strategies	H (3x3=9)	DSL/Tutors	Termly

Hazard / Risk	Who Might Be Harmed	Potential Consequences	Existing Control Measures	Additional Controls / Actions Required	Risk Rating (LxS)	Responsible Person	Review Date
Domestic abuse / family harm	Learners	Emotional trauma, attendance issues, safeguarding risk	Staff training; safeguarding reporting routes	Awareness sessions; safe disclosure opportunities; referrals to specialist agencies; record concerns on safeguarding system	H (3x3=9)	DSL	Termly
Transition points (entry, exit, change of provision)	Learners	Increased vulnerability, loss of support, disengagement	Induction processes; exit procedures	Enhanced transition risk assessments; information sharing with next provider; safeguarding exit checks	M (3x2=6)	Centre Manager / DSL	Termly
Staff wellbeing and secondary trauma	Staff, indirectly learners	Burnout, reduced safeguarding vigilance	Supportive management culture; access to HR support	DSL supervision; debriefs after serious incidents; wellbeing support and training	M (2x3=6)	Centre Manager	Annual
Safeguarding governance and oversight	Learners, organisation	Weak challenge, ineffective safeguarding practice	Policies approved by leadership; DSL reporting	Regular safeguarding reports meetings (monthly); annual safeguarding effectiveness review; CPOMS utilised by all staff and Associates	M (2x3=6)	DSL / Directors	Annual

Safeguarding Reporting: CPOMS Designated Safeguarding Lead: Loren Janes Deputy: Charlotte Manford

Emergency Procedures: Fire and Medical signage displayed

Monitoring: Reviewed at H&S (Termly) and Safeguarding Meetings (Monthly)

Review Process:
The assessment must be reviewed **at least annually**, or sooner if:

- There is a change in working practices, legislation, or premises;
- An incident, near miss, or safeguarding concern highlights new risks; or
- Directed by the Designated Safeguarding Lead (DSL) or Health & Safety Lead.
  All updates must be version-controlled and authorised by the Centre Manager before issue.

Staff Communication:
This document is communicated to all relevant staff during induction and at termly team briefings.
Any updates are circulated by email and discussed at staff meetings. All employees are required to familiarise themselves with the content and confirm understanding as part of ongoing compliance.

Staff Name	Signature	Date Briefed