

ConnectED

Apprenticeships

Safeguarding and Child Protection Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Date written: August 2025 (with KCSIE 2025 guidance which will come into effect September 1, 2025).

Date of next review: July 2026 (or in response to any changes to local or national guidance or contextual Safeguarding themes/incidents).

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedure.

Key Contacts

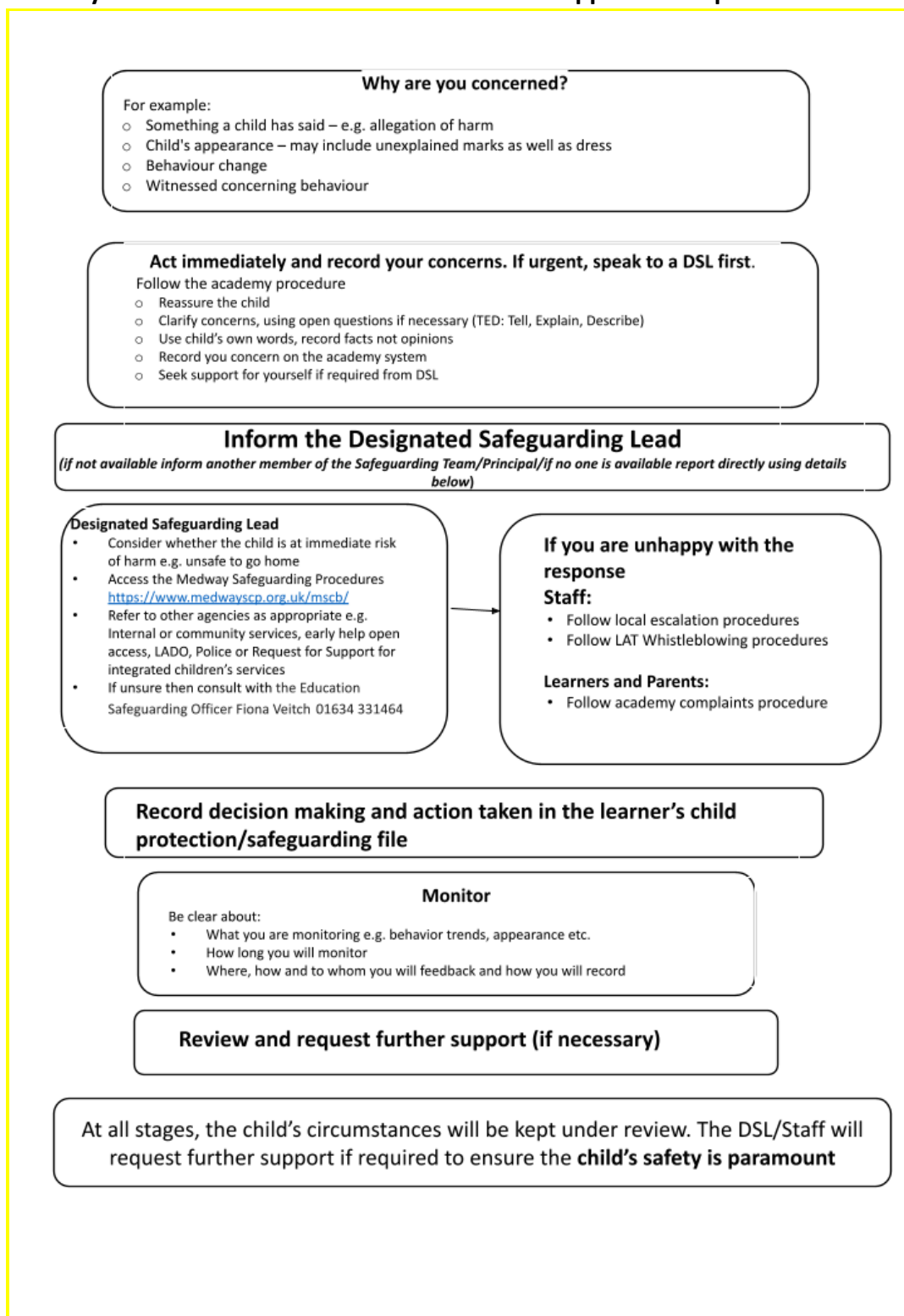
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1. What to do if you have a welfare concern in ConnectED Apprenticeships:



2. Child Focused Approach to Safeguarding

2.1. Introduction

- ConnectED Apprenticeships recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and learners) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- ConnectED Apprenticeships believe that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at ConnectED Apprenticeships will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding **children who are registered for an apprenticeship programme with ConnectED Apprenticeships** but may also apply to other children connected to ConnectED Apprenticeships, for example, siblings, or younger members of staff (under 18s) or children on student/work placements. **Concerns related to children in an apprentices' employment setting will be addressed using the employers' own safeguarding policy and processes.** This policy is to be used alongside [the Leigh Institute Safeguarding Policy](#) which provides an overarching structure for the safeguarding practices of the whole of the Leigh Institute.
- ConnectED Apprenticeships recognises the importance of providing an ethos and environment within ConnectED Apprenticeships that will help children to be safe and to feel safe.
- In our ConnectED Apprenticeships children are respected and are encouraged to express themselves openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide with an understanding that some children will require additional support or are not always ready to talk.
- ConnectED Apprenticeships recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:

- Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - Protection: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - Support: adopt a child centred approach and provide support for all pupils/students, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
 - Collaboration: with both parents and carers where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2025.

3. Policy context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the [Children Acts 1989](#) and [2004](#) and related guidance. This includes but is not limited to:
 - [Keeping Children Safe in Education 2025 \(KCSIE\)](#)
 - [Working Together to Safeguard Children 2023\(WTSC\)](#)
 - [Ofsted: Education Inspection Framework'](#)
 - [Framework for the Assessment of Children in Need and their Families 2011](#)
 - [Kent and Medway Safeguarding Children Procedures](#)
 - [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children
 - [The Education Act 2002](#). Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
 - [Education and Inspections Act 2006](#)
 - [The Human Rights Act 1998](#)
 - [The Equality Act 2010](#) (including the Public Sector Equality Duty)
 - Section 5B(11) of the Female Genital Mutilation Act 2003, [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover

that female genital mutilation (FGM) appears to have been carried out on a girl under 18 and [Statutory guidance on FGM](#).

- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
 - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
 - [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
 - [DfE: Relationships and sex education \(RSE\) and health education statutory guidance-2025](#)
- ConnectED Apprenticeships will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.
 - ConnectED Apprenticeships recognise that as a result of the Covid-19 pandemic and other challenges experienced by pupils and their families since, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

4. Definition of safeguarding

- In line with 'Working Together to Safeguard Children' and KCSIE 2025, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - Providing help and support to meet the needs of children as soon as problems emerge
 - Protecting children from maltreatment, whether that is within or outside the home, including online
 - Preventing impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
 - Taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

- Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- Children include everyone under the age of 18.
- The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 - The local authority (LA)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for an area in the LA area
- Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- ConnectED Apprenticeships acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

Abuse and neglect	Hate
Bullying, including cyberbullying	Homelessness
Children with family members in prison	Human trafficking and modern slavery
Children Missing Education (CME) including children deliberately missing Education.	Mental Health

Child missing from home or care	Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
Child on child abuse	Online safety
Child Sexual Exploitation (CSE)	Preventing radicalisation and extremism
Child Criminal Exploitation (CCE)	Private fostering
Children and the Court System	Relationship Abuse
Children who are lesbian, gay, or bisexual or children who are perceived by other children to be lesbian, gay, or bisexual (whether they are or not).	Serious Violence
Contextual safeguarding (risks outside the family home)	Sexual Violence and Sexual Harassment
County lines and gangs	Sexting
Domestic abuse-understanding the effects of what they see, here and experience.	So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
Drugs and alcohol misuse	Upskirting
Fabricated or induced illness	
Faith abuse	
Gender based abuse and violence against women and girls	

(Also see Part one and Annex B within ‘Keeping Children Safe in Education’ 2025)

5. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

6. Related safeguarding policies

Trust Policies	ConnectED Apprenticeships Policies
Confidentiality	Complaints Policy
Staff Code of Conduct	Emergency Procedures such as evacuations and lockdowns
Searching, screening and confiscation	Risk assessments
Online Safety	Behaviour and Anti-Bullying Policy
Data protection and Information Sharing Policy	Apprenticeship Code of Conduct Policy including Attendance Policy
Health and Safety Policy including Risk Assessment Policy	ConnectED Apprenticeship Coursework Assessment Malpractice and Maladministration
Managing Allegations Against Staff, including Low Level Concerns	The Leigh Institute Safeguarding Policy
Whistleblowing	
Safer Recruitment Policy	
First aid and accidents, including medication and managing illness, allergies, health, and infection	
Mobile and smart technology	

Supporting Guidance (to be read and followed alongside this document)

- “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - [Safer Recruitment Consortium](#)
- These policy documents can be found through our [website](#)

7. Policy compliance, monitoring and review

- ConnectED Apprenticeships will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2025 as appropriate. This will be provided as part of the online training through the Thrive Platform.
- Parents/carers can obtain a copy of the ConnectED Apprenticeships Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the ConnectED Apprenticeships [website](#)
- The policy forms part of our ConnectED Apprenticeships development plan and will be reviewed annually by the Leigh Institute Board who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and principal will ensure regular reporting on safeguarding activity and systems to the Board. The governing body will not receive details of individual situations or identifying features of families as part of their oversight responsibility.

8. Key Responsibilities

Governance and leadership

- The Leigh Institute Board, LAT Trust Executive and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The Community Board has regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

- All Board members will read and work in accordance of the KCSIE 2025 and will attend the regular safeguarding training they are offered which will equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.
- ConnectED Apprenticeships has a nominated governor responsible for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the provision has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required. The safeguarding governor will make regular visits to review procedures that are in place and provide reports to the Board. A copy of the Link Governor for Safeguarding roles and responsibilities can be found [here](#).
- The Board, LAT Trust Executive and senior leadership team will ensure that the Designated Safeguarding Lead (DSL) is supported in their role.
- The Board will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The Leigh Institute Board are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Local Children's Partnership (Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)))
 - This includes but is not limited to safeguarding all members of the ConnectED Apprenticeship's community (for example, staff, learners, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
 - For further information about our approaches to equality, diversity, and inclusion, please access our [ConnectED Apprenticeships Equal Diversity & Inclusivity Policy \(EDI\)](#)
- The Board and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The Principal will ensure that our child protection and safeguarding policies and procedures adopted by the Board are understood, and followed by all staff.
- The Board will ensure an appropriate senior member of staff, from the leadership team, is appointed to the role of designated safeguarding lead. The Governing Board and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

- The provision has a nominated governor for safeguarding. The Board of Governors and the Safeguarding Governor will support the DSL and have oversight in ensuring that the provision has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

Designated Safeguarding Lead (DSL)

- ConnectED Apprenticeships has appointed Esther Cook, Director and Head of Apprenticeships, a member of the senior leadership team, as the Designated Safeguarding Lead (DSL).
- Leigh Academies Trust maintains records of all designated staff for reference and use at Trust level.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated. The details of this role are explicit in the DSL's job description.
- The Provision has also appointed a Deputy DSL who will have delegated responsibilities and act in the DSL's absence. Any deputies are trained to the same standard as the designated safeguarding lead and the role is explicit in their job description.
 - Polly Butterfield-Tracey, Deputy Director and Head of KMT
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns.
 - Maintaining a confidential recording system for safeguarding and child protection concerns.
 - Coordinating safeguarding action for individual children.
 - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated assessor
 - Liaising with other agencies and professionals in line with KCSIE and WTSC.

- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Local Children’s Partnership procedures, including referrals, are followed, as necessary.
 - Representing, or ensuring the Provision is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
 - Managing and monitoring the Provision’s role in any multi-agency plan for a child.
 - Being available during term time (during school hours) for staff in the Provision to discuss any safeguarding concerns.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities. This includes signposting to the appropriate outside agencies with capacity for managing high risk Safeguarding incidents.
 - Taking lead responsibility for online safety, including having oversight of the effectiveness of the filtering and monitoring systems and processes in place. This is accomplished through regular checks which are logged and triangulated to inform further support to children.
 - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and ConnectED Apprenticeships' leadership staff.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Liaising with the principal to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs’ training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
 - We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker. Where this is the case, the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.
 - The Principal and DSL responsibility for children accessing Alternate Provision in accordance to guidance outlined in the KCSIE 2025. The Principal and DSL will due regard for the Safeguarding and wellbeing of the pupils that are accessing an alternative provision.
In the case of our apprenticeship provision, ‘alternate provision’ may be used to describe delivery partner settings, working through a service level agreement to deliver aspects of our programme.

This provision will obtain written assurance from the alternative provider that appropriate safeguarding checks have been carried out on staff. This includes confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk

(i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff. In addition, that the where the pupil is based during school hours is known by the DSL and Principal. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The Provision takes responsibility for the consistent reviews of alternative provision placements, at least half termly, to ensure the child is regularly attending and the placement continues to be safe and suitable. Where there are safeguarding concerns the placement should be reviewed, and potentially terminated, unless the concerns are satisfactorily addressed.

The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to learners and employers when their child joins the provision through our Aptem platform, and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting.

Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All members of staff have a responsibility to:

- To provide a safe environment in which children can learn.
- To be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
- Know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
- Know that children can be at risk of harm inside and outside of their home, at school and online

- Know that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
 - Know that a child and their family may be experiencing multiple needs at the same time
 - To be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - Be prepared to identify children who may benefit from early help.
 - To understand the early help process and their role in it.
 - To understand the provision's safeguarding policies and systems.
 - Undertake regular and appropriate training which is regularly updated.
 - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - Know how to maintain an appropriate level of confidentiality and sharing information in accordance with the KCSIE, DPA/UKGDPR for the purposes of keeping children safe.
 - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - Act in line with Teachers' Standards 2012 which state that teachers (including Principal s) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at ConnectED Apprenticeships recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
 - Staff at ConnectED Apprenticeships will determine how best to build trusted relationships with learners, employers and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff Code of Conduct and pupil/student behaviour policies.

Children and young people

- Children and young people have a right to:
 - Feel safe, be listened to, and have their wishes and feelings taken into account.
 - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of the Provision Safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

Parents and carers and employers

- Parents/carers **and employers** have a responsibility to:
 - Understand and adhere to the relevant ConnectED Apprenticeships policies and procedures.

- Talk to their children about safeguarding issues and support the Provision in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online.
- Seek help and support from the Provision or other agencies.

Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. This training is available to all staff via our training platform called Thrive. Thrive provides a dashboard for the DSL to confirm who has completed training in all safeguarding areas. Thrive also holds attendance for events such as DSL training and Safer Recruitment training.

Staff Safeguarding training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas. This training is also provided through our Thrive system.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). There are small bite sized training sessions for staff briefings called Pupil Protect and these are also available through Thrive.

Volunteers will receive appropriate training, if applicable.

The DSL and Deputies

DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

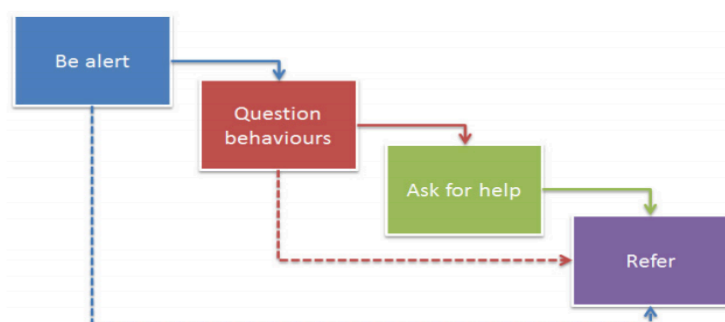
As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

9. Child Protection Procedures

Recognising indicators of abuse and neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- ConnectED Apprenticeships recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



'What to do if you are worried a child is being abused' 2015

- ConnectED Apprenticeships recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- ConnectED Apprenticeships recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the Provision. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- ConnectED Apprenticeships recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- ConnectED Apprenticeships recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the Provision behaviour policy and 'Searching, Screening and Confiscation' policy which is informed by the DfE ['Searching, screening and confiscation at school'](#) guidance.
 - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a learner was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the learner who has been searched to assess the incident against any potential wider safeguarding concerns.

- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
 - Listen carefully to the child, reflecting back the concern.
 - Use the child's language.
 - Be non-judgmental.
 - Avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
 - Do not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - To be clear about boundaries and how the report will be progressed.
 - Record the concern using the facts as the child presents them, in line with Provision record keeping requirements.
 - Inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door/MASH Team. In these circumstances, any action taken will be shared with a DSL as soon as possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- ConnectED Apprenticeships will respond to safeguarding concerns in line with the KSCMP procedures/LCP/Medway Safeguarding Procedures. Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP). The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <https://www.kscmp.org.uk/>.
- Medway Safeguarding Children Multi-Agency Partnership procedures. The full Medway Safeguarding procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <https://www.medwayscp.org.uk/mscb/>.

- London Child Protection Procedures and London Safeguarding Children Threshold Document (which is found online at <https://www.londoncp.co.uk/>)
- Where it is identified a child may benefit from Early Help support, the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door/MASH.
 - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door/MASH or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Integrated Children's Services/Medway Social Services (Front Door/MASH/SPA) and/or the police in line with KSCMP procedures/LCP/Medway Safeguarding Procedures. **(This will depend upon the location of the learner)**
 - ConnectED Apprenticeships recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with Local Children's Partnership guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from an the Trust Safeguarding Advisor, Education Safeguarding (Bexley, Greenwich, Medway) or Lessas in Kent before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In most cases our direct contact is with an apprentices' employer, rather than directly with parents. In the event of a request for support to the Front Door/MASH being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's employers (and parents if deemed appropriate), with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the Local Children' Partnership Escalation Policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for the Provision to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the Provision where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network. Where the Provision is unsure, advice will be sought from the Trust Safeguarding Advisor, Trust Safeguarding Lead or their local Education Safeguarding Service (Greenwich, Bexley and Medway). In Kent, advice can be sought from Lessas. Consultations can also be completed with local Social Work Teams.

9.1. Child Protection Procedures

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by 'Working Together to Safeguard Children'-2023 and 'Keeping Children Safe in Education-2025'.
- If staff are made aware of a child protection concern, they are expected to:
 - Listen carefully to the concern and be non-judgmental;
 - Only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED);
 - Not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services;
 - Be clear about boundaries and how the report will be progressed;
 - Record the concern in line with the Provision record keeping requirements (see section 9);
 - Inform the DSL (or deputy), immediately using the contact details provided

ConnectED Apprenticeships adheres to the

- Medway Safeguarding Children Multi-Agency Partnership procedures. The full Medway Safeguarding procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <https://www.medwayscp.org.uk/mscb/>. **But may work with other agencies based upon the location of the learner.**

- The Provision recognises that in situations where there are immediate child protection concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with KSCMP guidance which may involve multi-agency decision making. The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps. They may also seek advice or guidance from a social worker
- If a child is in immediate danger or is at risk of harm, a request for support will be made immediately to Integrated Children's Services/Medway Social Services (Front Door/MASH/SPA) and/or the police in line with KSCMP procedures/LCP/Medway Safeguarding Procedure, **depending upon the location of the learner.**
- All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- In most cases, a request for support will be made by the DSL or a deputy. However if the DSL or a deputy is not immediately available to discuss an urgent concern, staff will seek advice from another member of the Provision leadership team or from Marla England. If anyone other than the DSL makes a referral to external services, they will inform the DSL as soon as possible.
- In the event of a request for support to the Front Door/MASH/SPA being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP/LCP/Medway Safeguarding Parents/carers will be informed unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the Front Door/MASH/SPA if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [KSCMP escalation procedures](#) /[RBG Escalation Policy](#) /[Resolving Professional Differences – Multi-agency Escalation policy](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

10. Record Keeping

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing via **email** and brought without delay to the attention of the DSL.

- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will accurately reflect the voice of the child at every available stage. The views of the parents/carers will be consistently sought and will be recorded as part of safeguarding processes supporting the child.
- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the Provision. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent Provision, under confidential and separate cover 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. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the Provision receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-ordinators (SENCOs) will be made aware of relevant information as required.

11. Multi-agency working

- ConnectED Apprenticeships recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the Local arrangements as identified within 'Working Together to Safeguard Children'.

- The Provision leadership team, Board and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- ConnectED Apprenticeships recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to LCP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The Provision will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The Principal and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our Provision's 'Searching, Screening and Confiscation' policy and behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

12. Confidentiality and information sharing

- ConnectED Apprenticeships recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Where reasonably possible, the Provision will hold more than one emergency contact number for each pupil/student.
- ConnectED Apprenticeships has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our Provision is compliant with all matters relating to confidentiality and information sharing requirements. Richard Cottam richard.cottam@latrust.org.uk
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
 - KCSIE 2025 the [Information Commissioner's Office \(ICO\)](#) and the DfE "[Information sharing advice for safeguarding practitioners](#)" guidance provides further details regarding information sharing principles and expectations.
- The Principal and DSL will disclose relevant safeguarding information about a [pupil/student](#) with staff on a 'need to know' basis. Staff will be provided with enough information to keep a

child safe which may include complex safeguarding systems around the child for their wellbeing. Staff will be provided with appropriate updates to promote a culture of vigilance and professional challenge.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our Data Protection/GDPR policy (<https://lat.sharepoint.com/sites/policies/SitePages/Data-Protection-Policy.aspx>). Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy) and outside agencies such as Police and Children's Social Care. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

13. Complaints

- All members of the Provision community should feel able to raise or report any concerns about children's safety or potential failures in the Provision safeguarding regime. The Provision has a complaints procedure available to parents, pupils/students and members of staff and visitors who wish to report concerns or complaints. This can be found on our website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse in education can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at ConnectED Apprenticeships will take all concerns reported to the provision seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
- Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

14. Specific Safeguarding Issues

- ConnectED Apprenticeships is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs,

Provision leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.

- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

Child-on-child abuse

- All members of staff at ConnectED Apprenticeships recognise that children can abuse other children (referred to as child-on-child abuse, previously known as ‘peer-on-peer’ abuse), and that it can happen both inside and outside of Provision and online.
- ConnectED Apprenticeships recognises that child-on-child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - Abuse in intimate personal relationships between children
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 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
 - Upskirting (which is a criminal offence), 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
 - Initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).
- ConnectED Apprenticeships adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

- ConnectED Apprenticeships recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, ConnectED Apprenticeships will embed safeguarding training throughout our programmes
- ConnectED Apprenticeships wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated Provision policies, including child protection, anti-bullying, and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about learners' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with learners, employers and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by the Trust employee assistance scheme

Child-on-child sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, ConnectED Apprenticeships will follow the guidance outlined in Part five of KCSIE.
- ConnectED Apprenticeships recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' ConnectED Apprenticeships recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- **All** victims of sexual violence or sexual harassment will be 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. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the Provision will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.

- ConnectED Apprenticeships recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
- ConnectED Apprenticeships recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
 - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support.
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students, and staff and any actions that are required to protect them.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the Provision and where necessary will be referred to Front Door/MASH (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
 - The wishes of the victim in terms of how they want to proceed.
 - The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - The ages of the children involved.
 - The developmental stages of the children involved.
 - Any power imbalance between the children.
 - If the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - That sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - Understanding intra familial harms and any necessary support for siblings following incidents.
 - Whether there are any ongoing risks to the victim, other children, adult students, or Provision staff.
 - Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The Provision will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary

or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

Nude and/or semi-nude image sharing by children

- ConnectED Apprenticeships recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
 - To report any concerns to the DSL immediately.
 - Never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - Do not delete the imagery or ask the child to delete it.
 - To avoid saying or doing anything to blame or shame any children involved.
 - To reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - Not to investigate or ask the child(ren) involved to disclose information regarding the imagery
 - To not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - Employers and Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.

- All decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to ICS and/or the police immediately if:
 - The incident involves an adult (over 18).
 - There is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - The image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - A child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- ConnectED Apprenticeships recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in 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.
- ConnectED Apprenticeships recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- ConnectED Apprenticeships recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example 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 and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

Serious violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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 CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fmu@fcdo.gov.uk
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.

Preventing radicalisation

- ConnectED Apprenticeships recognises that children are vulnerable to extremist ideology and radicalisation. ConnectED Apprenticeships is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- All staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from radicalisation.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

Cybercrime

- ConnectED Apprenticeships recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

Domestic abuse

- ConnectED Apprenticeships recognises that:

- Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
 - Domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
 - Children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
 - Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
 - Domestic abuse can take place within different types of relationships, including ex-partners and family members.
 - There is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
 - Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
 - Domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
 - It is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

Mental health

- All staff recognise 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.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff 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.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

15. Supporting Children Potentially at Greater Risk of Harm

- Whilst all children should be protected, ConnectED Apprenticeships acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups:

Safeguarding children with Special Educational Needs or Disabilities (SEND)

- ConnectED Apprenticeships acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- ConnectED Apprenticeships recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our Provision will always consider implementing extra pastoral support and attention for children with SEND.

Children requiring mental health support

- ConnectED Apprenticeships has an important role to play in supporting the mental health and wellbeing of our learners. 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.
- Where there are concerns regarding possible mental health problems for pupils/students, staff should speak to one of our Mental Health First Aiders in the first instance.
- Age/ability appropriate education will be provided to our learners to help promote positive health, wellbeing, and resilience as documented in our curriculum maps.

Children who need a social worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children in the Provision so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform Provision decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

Looked after children, previously looked after children and care leavers

- ConnectED Apprenticeships recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Where a child is looked after, the DSL will hold details of the social worker

Children who are Lesbian, Gay, Bi, or Trans (LGBT) and/or Gender Questioning

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, ConnectED Apprenticeships recognises that children who are LGBTQ+, Gender questioning or are perceived by other children to be LGBTQ+ (whether they are or not) can be targeted by other children or others within the wider community.

ConnectED Apprenticeships recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

16. Online Safety

This section should be read in conjunction with the Trust's Online Safety Policy.

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. ConnectED Apprenticeships will adopt a whole Provision approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- ConnectED Apprenticeships will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- ConnectED Apprenticeships identifies that the breadth of issues classified within online safety is considerable, but 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, radicalisation and extremism.
 - Contact: being subjected 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 (including 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.
- The Principal will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.
- Our Provision has processes to support our learners and the risks around the potential exposure to pornography and misogynistic influencers – including the ‘manosphere’ and ‘incel culture’ – and a range of other related risks including the use of artificial intelligence and ‘deepfakes’.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and employers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

ConnectED Apprenticeships recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

ConnectED Apprenticeships will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour and anti-bullying policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the Provision.

Policies and procedures

- The DSL has overall responsibility for online safety within the Provision but will liaise with other members of staff, for example the Trust's Director of Infrastructure , IT technicians and Trust HR as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Behaviour and Anti-bullying policy, and Code of Conduct.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- ConnectED Apprenticeships uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, and email systems.
 - All Provision owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place
- ConnectED Apprenticeships recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In accordance with KCSIE:
 - ConnectED Apprenticeships has appropriate Online Safety, BYOD (staff and students) Acceptable Use Templates (AUPs) which are shared and understood by all members of the community. We use LAT Trust policies, which can be found [here](#).

Responsibilities for Filtering and Monitoring, Information security and access management

- The Trust Board alongside the Trust Director of Infrastructure has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed under Trust-wide policy and practice. The work in close conjunction with the Trust Safeguarding leads and Provision DSLs to ensure the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified. ConnectED Apprenticeships is supported by the Central IT team, and complies with all Trust-wide policies and practices regarding the safe use of IT.
- ConnectED Apprenticeships is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our [Trust policy page](#), which includes our acceptable use policies and/or online safety policy.
- Richard Cottam, Trust DPO, is responsible for ensuring that our Provision has met the DfE [cyber security standards](#) for schools and colleges.

Remote/Online learning

- ConnectED Apprenticeships will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance. This applies to all our practices, but includes our Aptem platform.
- All communication with learners, employers and parents/carers will take place using Provision provided or approved communication channels; for example, Provision provided email accounts and phone numbers and/or agreed systems: Google Classroom, Microsoft 365 or Aptem.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our Provision behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

Online Safety Training for Staff

- ConnectED Apprenticeships will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

Educating Learners

- ConnectED Apprenticeships will ensure a comprehensive whole Provision curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

Working with parents/carers

- ConnectED Apprenticeships will build a partnership approach to online safety and will support employers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online. This forms part of our review discussions

17. Staff Engagement and Expectations

Staff awareness, induction and training

- All members of staff have been provided with a copy of part one or annex A of the current version of 'Keeping Children Safe in Education' 2025 which covers safeguarding information for staff.
 - Provision leaders, including the DSL and governors/trustees will read KCSIE 2025 in its entirety.
 - Leaders and all Provision members of staff who work directly with children will read annex B of KCSIE 2025.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them as part of the Thrive training.
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), to ensure they are aware of the Provision's Internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This is administered centrally using the Thrive platform, and augmented by Trust-wider face to face/online training. Safeguarding is also a regular feature of team meetings.
- Online safety training for staff will be integrated, aligned and considered as part of the whole Provision safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This is administered by the LAT central safeguarding and Learning and Development team.
- ConnectED Apprenticeships recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape Provision safeguarding arrangements and child protection policies, this includes through regular discussion at team meetings.

- All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated as part of the Trust central Governance support.
- The DSL and Principal will provide an annual report to the Community Board detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

Safer working practice

- Our Provision takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the Provision code of conduct.
- The DSL will ensure that all staff (including contractors) and volunteers are aware of the Provision expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the Provision behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant Provision policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

Supervision and support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The Provision will ensure that members of staff who are working as part of the Safeguarding team are provided with appropriate supervision in accordance with the statutory requirements of Working Together to Safeguard Children 2023.
- Members of staff who have engaged in a Safeguarding issue have the opportunity to additional support by the DSL, Principal or access Wellbeing services provided by the Trust.

- The Provision will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

18. Safer Recruitment and Allegations Against Staff

Safer recruitment and safeguarding checks

- ConnectED Apprenticeships is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
 - ConnectED Apprenticeships will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
 - The Leigh Institute Board, Trust Executive Leadership and Provision Leadership team are responsible for ensuring that the Provision follows safe recruitment processes as outlined within guidance.
 - The Leigh Institute Board, Trust Executive Leadership and Provision Leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The Provision maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- ConnectED Apprenticeships are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the provision learner with an alternative provision provider/delivery partner, we continue to be responsible for the safeguarding of that learner and will need to satisfy ourselves that the provider can meet the needs of the learner.

- ConnectED Apprenticeships will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school/college would otherwise perform in respect of our own staff. Delivery Partners will only be used with the permission of the employer.

Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the LCB arrangements. In depth information can be found within our Trust policy [Managing Allegations against Staff](#).
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the Provision From potential false allegations or misunderstandings.
- Where Principals are unsure how to respond, for example if the Provision is unsure if a concern meets the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#), in conjunction with Trust HR.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Principal (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

Concerns that meet the 'harm threshold'

- ConnectED Apprenticeships recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
 - Behaved in a way that has harmed a child, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with Part four of KCSIE. Allegations that meet the harm threshold will be referred

immediately to the principal who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Principal, staff are advised that allegations should be reported to the Deputy CEO and/or the Trust's People Director who will contact the LADO.

Concerns that do not meet the 'harm threshold'

- ConnectED Apprenticeships may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct/low-levels concerns policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
 - ConnectED Apprenticeships has an open and transparent culture in which all concerns about all adults working in or on behalf of the Provision are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the Provision are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the Provision may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our Code of Conduct to the Principal.
 - Where low-level concerns are reported to the Provision, the principal will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
 - The principal will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
 - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
 - If the Provision is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

- Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
- Where a pattern is identified, the Provision will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

Safe Culture

- As part of our approach to safeguarding, the Provision has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the Provision safeguarding regime. The leadership team at ConnectED Apprenticeships will take all concerns or allegations received seriously.
- All members of staff are made aware of the Trust's Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- ConnectED Apprenticeships has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our Provision, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).

19. Opportunities to Teach Safeguarding

- ConnectED Apprenticeships will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues as outlined on our [wider programme mapping](#) document.
- We recognise that the Provision plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- ConnectED Apprenticeships recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole school approach which prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- ConnectED Apprenticeships has a clear set of values and standards, upheld, and demonstrated throughout all aspects of the provision's life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- ConnectED Apprenticeships recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our Provision systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

20. Physical Safety

Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy and is in line with the DFE '[Use of reasonable force in schools](#)' guidance. Any uses of reasonable force are recorded.

Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into the Provision as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The Provision will not accept the behaviour of any individual (employer, parent or other) that threatens Provision security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the Provision site.

21. Local Support

- All members of staff in ConnectED Apprenticeships are made aware of local support available.

Children's Specialist Services/Early Help

- **Kent:**
 - 03000 41 11 11 (Out of Hours- 03000 41 91 91)
 - Form/Portal: <https://kccchildrens.kent.gov.uk/web/portal/pages/home>
- **Medway:**
 - Monday to Friday from 9am to 5pm on 01634 334 466 (Out of hours on 03000 419191)
https://www.medway.gov.uk/info/200170/children_and_families/600/worried_about_a_child/1
- **Bexley:**
 - Children's Services at the Multi-Agency Safeguarding Hub (MASH) on 020 3045 5440 and ask for a consultation with a social worker. The opening hours are Monday to Friday 9am to 5pm
<https://www.bexley.gov.uk/services/health-and-social-care/social-care-for-children/reporting-concerns-about-child/worried-about-child>
 - Email: children's triage team@bexley.cjsm.net
- **Greenwich:**
 - To contact the child referral team, please call 020 8921 3172.
 - For out of hours emergencies, please call 020 8854 8888.
 - https://www.royalgreenwich.gov.uk/info/200160/contact_us/1996/contact_childrens_services
 - Police 999 (urgent) 101 (non-urgent)

- Local Authority Designated Officer (LADO)

Kent: 03000 41 08 88

(Referral)

<https://www.kelsi.org.uk/child-protection-and-safeguarding/managing-staff-allegations>

Medway: Tel: 01634 331 065

Bexley: 0203 045 3436 (LADO Team)

Email: LADO@bexley.gov.uk

Greenwich: Telephone: 020 8921 3930

Email: childrens-Lado@royalgreenwich.gov.uk

childrens-Lado@royalgreenwich.gov.uk.cjsm.net

- <https://www.kscmp.org.uk> (Kent)
- https://www.medway.gov.uk/info/200512/medway_safeguarding_children_partnership_msc_p (Medway)
- <https://bexleysafeguardingpartnership.co.uk> (Bexley)
- <https://www.greenwichsafeguardingchildren.org.uk> (Greenwich)

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious

bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.org.uk/

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk

- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices:
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk