



**Safeguarding & Child
Protection Policy –
Progress Arc – Billinge**

2026/2027

Policy issue and updates

Pages	Issue	Date
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This policy has been approved by the Divisional CEO and Governing Board. It is reviewed annually, or sooner if changes in legislation, statutory guidance or the Progress Arc quality assurance framework require it.

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Board signatory: 

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1. Policy statement, vision and values

Progress Arc recognises its statutory responsibility to safeguard and promote the welfare of all pupils. We provide a safe, inclusive environment where children and young people are respected, valued and protected from harm.

Safeguarding is everyone's responsibility. Our schools are part of a wider safeguarding system, and we work closely with families, safeguarding partners and other agencies. We maintain an attitude of "it could happen here" and always act in the best interests of the child. We understand that children can be harmed by adults or by other children, including online, and we aim to embed safeguarding in every aspect of school life through training, education, vigilance and robust procedures.

Our practice is underpinned by five principles: the welfare of the child is paramount; all children have the right to be safe and protected from harm; every child should feel valued, listened to and supported; safeguarding is everyone's responsibility; and effective safeguarding relies on early intervention, partnership working and a child-centred approach.

2. Purpose and intent

This policy sets out the safeguarding responsibilities, procedures and expectations for everyone working in or on behalf of Progress Arc and should be read alongside local safeguarding procedures and relevant statutory guidance. Its intent is to embed safeguarding throughout the culture and practice of every Progress Arc so that children are safe, supported and able to achieve their potential.

It aims to ensure that: pupils are protected from abuse, neglect, exploitation and other harm; concerns are identified, recorded and responded to promptly and appropriately; staff understand and fulfil their responsibilities; pupils are supported to keep themselves safe, including online; arrangements are effective and compliant with statutory requirements; and the school works effectively with families and partner agencies.

This policy applies to all staff, governors, trustees, volunteers, contractors, agency staff, visitors and any other individuals working in or on behalf of Progress Arc. All adults share responsibility for safeguarding and must act in accordance with it.

3. Legislation and statutory guidance

The school adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Local Safeguarding Children Partnership, including the following.

Guidance / legislation	Relevance to this policy
Keeping Children Safe in Education (KCSIE) 2026	The key statutory safeguarding guidance for schools and colleges, covering child protection, safer recruitment, managing allegations, child-on-child abuse, online safety, filtering and monitoring, early help and multi-agency working.
Working Together to Safeguard Children (2026)	The national framework for safeguarding through effective multi-agency partnership working.
Children Act 1989 and 2004	The legal framework for safeguarding, including the principle that the child's welfare is paramount.
Education Act 2002	Places a duty on schools to safeguard and promote the welfare of children.
Children and Social Work Act 2017	Strengthens safeguarding arrangements and places duties on safeguarding partners.
Counter-Terrorism and Security Act 2015 (Prevent Duty)	Requires schools to have due regard to preventing people being drawn into terrorism.
Multi-Agency Statutory Guidance on FGM (2020) and Serious Crime Act 2015	Set out FGM responsibilities, including the mandatory reporting duty for teachers for known cases in under-18s.
Safeguarding Vulnerable Groups Act 2006; School Staffing (England) Regulations 2009; Rehabilitation of Offenders Act 1974	Provide the framework for DBS checks, safer recruitment and the disclosure of criminal convictions.
Equality Act 2010 and Human Rights Act 1998	Protect pupils from discrimination and underpin dignity, privacy and fair treatment.
Domestic Abuse Act 2021	Recognises children as victims of domestic abuse where they see, hear or experience its effects.
Voyeurism (Offences) Act 2019; Marriage and Civil Partnership (Minimum Age) Act 2022	Support responses to image-based abuse and raise the minimum age of marriage to 18.
Online Safety Act 2023	Supports schools' work to protect children from online harms.
Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025	Provide the legal framework for handling, sharing and protecting personal safeguarding information.
Part 3 of Schedule 1, Education (Independent School Standards) Regulations 2014	Establishes safeguarding and welfare requirements for independent schools.

Guidance / legislation	Relevance to this policy
SEND Code of Practice: 0–25 Years	Recognises that children with SEND may face additional safeguarding vulnerabilities.
Information Sharing: Advice for Practitioners (2024); What to Do if You're Worried a Child is Being Abused (2015)	Support effective information sharing and recognising and responding to concerns.
Guidance for Safer Working Practice (2022); Sharing Nudes and Semi-Nudes (2024); Teaching Online Safety in Schools (2023); Filtering and Monitoring Standards (2026)	Support safe professional conduct, responses to youth-produced sexual imagery, online safety education and filtering/monitoring.
Local Safeguarding Children Partnership Procedures	Provide local inter-agency arrangements, referral pathways and thresholds the school must follow.

This policy operates alongside the other Progress Arc policies listed in Section 22.

4. Equality statement

4.1 Commitment to equality

We are committed to anti-discriminatory practice and comply with the Equality Act 2010 and the Public Sector Equality Duty. Some children are at increased risk of abuse, and additional barriers can exist to recognising or disclosing it; we ensure all children have the same protection regardless of any barriers they face. We will eliminate discrimination, harassment and victimisation, advance equality of opportunity, and foster good relations between those who share a protected characteristic and those who do not.

The Equality Act 2010 protects the following characteristics: sex (based on biological sex), race, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, disability, age (in relation to employment only), and marriage and civil partnership (in relation to employment only).

4.2 Supporting vulnerable groups

Some children may face additional barriers or vulnerabilities, including children with SEND; children with protected characteristics; children questioning their gender; children subjected to sexual violence or harassment; children from minority ethnic groups; children who speak English as an additional language; children in care or previously looked after; children with a social worker; young carers; and children with medical conditions. See Section 10 (SEND), Section 11 (children with a social worker), Appendix B (child-on-child abuse) and Appendix G (children questioning their gender).

4.3 Reasonable adjustments

Under the Equality Act 2010 we make reasonable adjustments for pupils, staff and parents/carers with disabilities – for example auxiliary aids and services (hearing loops, adaptive keyboards), changes to policies or procedures, information in accessible formats, and physical accessibility where possible. Each case is considered individually, taking account of the needs of the individual, the effectiveness and practicality of the adjustment, cost, health and safety, and the impact on others. See our SEND Policy for more information.

5. Confidentiality and information sharing

5.1 Legal framework

Information sharing is vital in identifying and tackling abuse and neglect and promoting children's welfare. The school adheres to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, none of which prevent information sharing for safeguarding purposes. Safeguarding is a lawful basis to process sensitive information without consent (DPA 2018, Part 2, s.18; Schedule 8, para 4), and information can be shared without consent where this would place a child at risk. We do not assume others will share critical information, and we will comply with the information sharing duty under KCSIE 2026, updating our procedures when statutory guidance is published. See our GDPR and Data Protection Policy for full details.

5.2 Key principles

Timely information sharing is essential. Fears about sharing must not prevent protecting children. We share on a need-to-know basis, never promise confidentiality to a child, and record what is shared and with whom, why, and any decision not to seek consent.

5.3 Sharing with parents/carers

This policy is available on the school website and shared at induction and initial visits. The DSL discusses concerns with parents/carers; other staff do so only after consulting the DSL. We will not inform parents/carers if this would increase risk to the child, place them at greater risk of harm, or undermine evidence collection – in which case we discuss this with children's social care first. In child-on-child abuse cases we normally inform all parents/carers involved.

5.4 Transferring child protection files

When a child transfers, the DSL transfers files securely and separately from the main pupil file; includes a summary of current concerns, context and support needs; distinguishes current from historic information; shares risk information so the receiving school can implement support plans; and obtains confirmation of receipt.

5.5 Seven golden rules

Government guidance sets out seven "golden rules" for information sharing:

1. Data protection laws enable, not prevent, appropriate information sharing.
2. Be open and honest – seek consent unless unsafe to do so.
3. Seek advice if in doubt.
4. Share with consent where possible, but you can share without consent where safety is at risk.
5. Consider safety and well-being when making decisions.
6. Share information that is necessary, proportionate, relevant, accurate, timely and secure.
7. Keep a record of decisions and what was shared.

6. Roles and responsibilities

All governors and staff read Part 1 of KCSIE 2026 in full at induction and annually, and a record is kept. Everyone shares responsibility for identifying concerns early, providing help and preventing escalation.

6.1 Governing board and proprietors

The Proprietor (Progress Arc Ltd), through its delegated governance arrangements hold strategic leadership responsibility for the school's safeguarding arrangements. The National Head of Safeguarding reviews this policy annually and monitors its effectiveness. Governors comply with their duties under statutory guidance and legislation and read Part 2 of KCSIE 2026. They ensure: an effective child protection policy published on the website and reviewed annually; well-promoted, accessible systems for children to raise concerns and give feedback; suitable behaviour and staff code of conduct policies; that all staff undertake safeguarding training on induction including Part 1 of KCSIE, integrated into whole-school and curriculum planning; that the school works with local safeguarding partners and has clear systems for children missing education and for identifying mental health problems; that children are taught about safeguarding, including online safety; that appropriate filters and monitoring are in place and reviewed at least annually by the senior leader responsible (with DSL and IT support), with records kept; and that a mobile phone policy restricts pupil access to phones during the day.

On staffing, they appoint a DSL from the senior leadership team whose role is explicit in the job description with appropriate time, funding, training and resources; ensure robust cover when the DSL is unavailable (including the confidential shared mailbox safeguarding@progress-schools.co.uk); ensure procedures for managing allegations against staff (including supply, trainee, volunteers and contractors); and respond to allegations against the headteacher, with the Chair of Governors acting as case manager (see Appendix F).

6.2 Headteacher

The Headteacher ensures this policy is adhered to by all staff; that staff and volunteers are informed of safeguarding systems at induction and know the DSL and deputies; decides on

and ensures training of deputy DSLs to the same standard as the DSL; organises DSL cover for out-of-hours and term-time activities; and appoints a Designated Teacher for looked-after and previously looked-after children. They ensure all recruitment follows safer recruitment guidance (Part 3 of KCSIE and Appendix D) and maintain a single central record. They act as case manager for allegations against staff – except where an allegation is made against the Headteacher/DSL, when a member of school governance acts as case manager and a deputy DSL takes on DSL responsibilities – and refer to the DBS any dismissals or resignations due to risk of harm to a child. They ensure the school works with social care, police, health and other agencies, and that children's social care can conduct section 47 or 17 assessments.

6.3 Designated Safeguarding Lead (DSL)

Full DSL responsibilities are set out in Annex C of KCSIE 2026. The DSL provides support and expertise to all staff, advises on responses to concerns, and is available during school hours (with a deputy available if not). Deputies are trained to the same standard, but ultimate responsibility remains with the DSL and cannot be delegated. The confidential shared mailbox safeguarding@progress-arc.co.uk ensures concerns are received and acted on without delay.

The DSL liaises with the Local Authority and other agencies; attends or ensures representation at multi-agency meetings; works with the SENCO, Virtual School Head and other professionals; identifies children who may benefit from early help; refers cases to children's social care, the Channel programme, the DBS and/or police; supports staff making referrals; and supports the school's Prevent duty. The DSL undertakes training at least every two years, updates their knowledge at least monthly, takes responsibility for accurate and timely recording, manages safeguarding files and their transfer, shares relevant information to promote educational outcomes, promotes a culture of safeguarding, and meets regularly with the proprietor representative and National Head of Safeguarding. Where an allegation is made against the Headteacher/DSL, a member of school governance acts as case manager, a deputy takes on DSL responsibilities, and the National Head of Safeguarding provides oversight.

6.4 All staff

All staff report welfare concerns following school safeguarding processes; understand early help (universal, community-based and Family Help) and their role in it; support children's social care and other agencies after referrals; identify indicators of abuse and neglect; know what to do if a child discloses; never promise confidentiality; understand child-on-child abuse and their role in prevention; understand referral processes to children's social care and support statutory assessments; and seek advice from the DSL when unsure. Teachers must safeguard children's wellbeing (Teaching Standards 2012). Staff receive safeguarding training at induction and regular updates (at least monthly), including online safety.

6.5 The SENCO

The SENCO works closely with the DSL to identify and address the vulnerabilities of pupils with SEND, holds regular meetings to share relevant information, participates in safeguarding investigations involving pupils with SEND, shares safeguarding information to inform EHC plan targets, and advises on adapting safeguarding approaches for individual needs. See our SEND Policy for full details.

7. Recognising abuse

7.1 Training

The school is committed to continuous professional development so that staff understand their safeguarding responsibilities and can identify signs of abuse, neglect or harm. All staff undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures), read Part 1 of KCSIE 2026 in full at induction and annually, and receive regular updates – through emails, e-bulletins and staff meetings – at least monthly. Training follows the local multi-agency arrangements established by the three safeguarding partners (the Local Authority, the Integrated Care Board and the Police). All staff also receive Prevent training to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Contractors provided through PFI or similar contracts, and volunteers, receive appropriate training in line with their role. Teachers receive training to manage behaviour effectively and understand the needs of all pupils.

DSL and deputies: undertake child protection and safeguarding training at least every two years via the local authority, alongside internal annual refresher training; update their knowledge at least monthly; and undertake Prevent awareness and online safety training. Governors: receive safeguarding training to perform their functions, read Part 1 of KCSIE 2026 in full, and – where they may act as case manager for an allegation against the Headteacher – receive training in managing allegations. Safer recruitment: at least one person on any interview panel has undertaken safer recruitment training in accordance with statutory guidance and local procedures.

7.2 Supervision and support

The DSL attends regular safeguarding supervision with the National Head of Safeguarding to sample concerns, logs and referrals and discuss complex cases. The National Head of Safeguarding conducts termly quality assurance visits, and additional training or support is implemented promptly where the QA outcome identifies a need. Safeguarding work can be emotionally challenging, so all staff have access to debriefing sessions with the DSL after serious incidents, external counselling, guidance from the DSL and National Head of Safeguarding, and regular safeguarding team meetings for peer support and shared learning. We are committed to a culture where staff feel confident to raise concerns and wellbeing is prioritised.

8. Recognising and responding to abuse: how to take action

8.1 Reporting concerns

Report concerns about a pupil's welfare to the DSL immediately. If the DSL is unavailable, report to the deputy DSL; if neither is available, speak to a senior leader and/or contact local children's social care directly. Any member of staff can make a referral to children's social care; where possible, speak to the DSL first, and if anyone other than the DSL makes a referral, inform the DSL as soon as possible.

8.2 What to report

Report any of the following to the DSL immediately: injuries beyond what is reasonably attributable to normal play; concerning behaviours, mood changes, use of language, drawings or stories; significant changes in attendance, punctuality or presentation; indicators of child-on-child abuse; concerns about people who may pose a risk to a child; disclosures of abuse; and concerns about a child carrying, using or expressing intent to use a weapon. See Appendix B for child-on-child abuse.

8.3 If a child discloses abuse

Do: listen without displaying shock or disbelief; accept what is said; allow the child to talk freely; reassure them (without making promises you can't keep) that it is not their fault and it was right to tell; ask questions only to clarify; explain what happens next; make a written record; and pass information to the DSL without delay.

Don't: promise confidentiality or criticise the alleged perpetrator.

8.4 If a child is suffering or likely to suffer harm

Report to the DSL immediately (or deputy DSL/senior leader if unavailable). Where possible speak to the DSL first, but do not delay a referral if a child may be suffering harm. Anyone can make a referral to children's social care. If a child is in immediate danger, call 999 or take the child to A&E. Where there is concern but not immediate harm, speak to the DSL to agree a course of action; the DSL decides whether to refer using threshold guidance; parents are informed unless this would place the child at further risk or undermine evidence collection; and all concerns, discussions and decisions are recorded. Options include internal pastoral support, local early help co-ordinator advice, universal and community-based early help, Family Help (targeted early help), and referral for statutory services.

8.5 Early help

Early help means providing support as soon as a problem emerges. Staff should understand the distinction between universal/community-based early help and Family Help (targeted early help). The DSL leads on liaising with agencies, setting up inter-agency assessments, monitoring and reviewing cases, and referring to children's social care if the situation does not improve. Staff identify children who may benefit, support early help assessments (sometimes as lead practitioner), and feed back to the DSL. Children who may particularly

benefit include those with SEND, disabilities or medical conditions; mental health needs; young carers; those showing signs of anti-social or criminal behaviour, gang involvement or county lines; those frequently missing from care or home; those at risk of modern slavery, trafficking, exploitation or radicalisation; those with family members in prison; those in challenging family circumstances (domestic abuse, substance misuse, parental mental ill health); those misusing drugs or alcohol; those returned home from care; those at risk of “honour”-based abuse, FGM or forced marriage; privately fostered children; and those persistently absent from education.

8.6 Making referrals

The DSL makes the referral or supports staff to do so, providing as much information as possible (including contextual harm outside the home). Inform the DSL immediately if you make a direct referral. The local authority decides within one working day; the DSL/referrer follows up if no outcome is received, records outcomes, and follows local escalation procedures if the child's situation does not improve. The DSL refers to the Multi-Agency Safeguarding Hub (MASH) for suspected abuse/neglect, to police where a crime may have been committed, and to the Channel programme for radicalisation concerns (consent required for support), passing any new information to police during a Channel assessment. Referrals are made by telephone (MASH), online form, or the out-of-hours team; in immediate danger, call 999. See Key Contacts.

9. Specific safeguarding issues

Staff receive training on, and take action where a child is at risk of or a victim of, the full range of safeguarding issues, including: physical, sexual, emotional abuse and neglect; child sexual and criminal exploitation (including county lines); domestic abuse; fabricated or induced illness; faith-based abuse; FGM; forced marriage; gangs and youth violence; gender-based violence (including misogyny and misandry); hate; online safety (including risks from generative AI); child-on-child abuse (including harmful sexual behaviour); radicalisation; relationship abuse; serious violence and weapons; sexual violence or harassment; making or sharing nudes or semi-nudes (including AI-altered or AI-generated images); “honour”-based abuse; trafficking and modern slavery; and financial exploitation. Detailed descriptions and indicators are in Appendix C; child-on-child abuse is covered in Appendix B.

Safeguarding incidents can be associated with factors outside the school and can occur between children outside these environments; staff consider extra-familial harm. Staff are also alert to the additional vulnerabilities of children in the court system, missing from education, with family members in prison, homeless, with a social worker, young carers, with medical conditions, looked after or previously looked after, and with mental health problems.

9.1 Female genital mutilation (FGM)

Any teacher who discovers (through disclosure or visual evidence) that FGM appears to have been carried out on a pupil under 18 must report this to the police personally. This is a statutory duty and failure to meet it may result in disciplinary sanctions; unless there is good reason not to, they should also discuss the case with the DSL and involve children's social care. Any other member of staff who discovers this must speak to the DSL and follow local safeguarding procedures. The teacher's personal reporting duty does not apply where a pupil is at risk of, or FGM is suspected but not known to have taken place; staff must not examine pupils, but any member of staff who suspects a pupil is at risk must speak to the DSL and follow local procedures.

9.2 Radicalisation and extremism

All schools have a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to preventing people being drawn into terrorism. Concerns about radicalisation or extremism must be reported to the DSL immediately. Where there is a radicalisation concern, the DSL makes a referral to the Channel programme; the individual must consent to any support delivered through Channel. If further or new information comes to light while a Channel referral is being assessed, this must be passed to the police.

9.3 Children with a social worker and children at greater risk of harm

Some children need a social worker due to abuse, neglect or family circumstances, and abuse and trauma can leave children vulnerable to further harm and educational disadvantage. The DSL holds information about social workers working with children at the school on CPOMS, which informs decisions about safeguarding and support (pastoral and academic). We also act to promote the educational outcomes of, and to protect, children missing education (recognising the signs early to prevent absence and potential CME) and children missing from home or care. We work with agencies, in accordance with statutory guidance to support children facing court procedures or in the court system, with family members in prison, who are homeless, who need a social worker, who are young carers, or who have medical conditions. See Section 11 for further detail.

9.4 Mental health

Mental health problems can be an indicator that a child has suffered, or is at risk of, abuse, neglect or exploitation. Staff are alert to behavioural signs – significant changes in behaviour, difficulty sleeping, physical signs of self-harm – and to examples such as self-harm, suicidal ideation and risk of suicide. Adverse childhood experiences can have a lasting impact on mental health, behaviour and education. We ensure any mental health interventions we offer are safe, effective and appropriate; where staff have a concern, we respond, discuss with parents/carers, and seek ways to support the child in and out of school. If a child is in immediate danger, call 999 or take them to A&E; if a mental health concern is also a safeguarding concern, take immediate action following Section 8; otherwise speak to the DSL to agree a course of action. Staff make use of their mental health support team (MHST) where available. Only appropriately trained professionals

should attempt a diagnosis; the school provides information, signposting and emotional health and wellbeing teaching through the curriculum. See the DfE guidance on mental health and behaviour in schools.

9.5 Child-on-child abuse

The school takes all reports and concerns about child-on-child abuse – including sexual violence and harassment, and incidents occurring off-site or online – very seriously. We understand that harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or violence, and we understand typical stages of sexual development, identify when behaviour deviates from what is developmentally appropriate, and respond promptly. Full details of how we prevent, respond to and support victims of child-on-child abuse are in Appendix B.

9.6 Online safety

Our approach to online safety runs through every aspect of our work and is set out in Appendix E and our separate E-Safety Policy. We have effective mechanisms to identify, intervene in and escalate incidents; online safety is included in the curriculum at all levels; and information is provided to parents/carers about the systems we use to filter and monitor online use, what we ask children to do online, and who they may interact with. We implement a mobile phone policy where pupils do not have access to phones at any time during the school day. Staff read the E-Safety Policy alongside the Code of Conduct in relation to personal online behaviour; bring-your-own-device is covered in the E-Safety Policy and pupil induction.

9.7 Restrictive physical interventions (RPI)

Progress Arc are specialist SEND settings where some students may require restrictive physical intervention to keep themselves or others safe. Our default position is that restrictive interventions are a last resort: most incidents are prevented and resolved through relational practice, environmental design, individualised behaviour support planning and skilled de-escalation. Any use of reasonable force, seclusion or restraint must be necessary, proportionate, mindful of the student's welfare, and consistent with their individual risk assessment and behaviour support plan; force is never used as punishment, and seclusion is a last-resort safety response to immediate risk of harm only. The presence of SEND does not lower the threshold for restrictive intervention – it raises the importance of robust prevention and de-escalation. All significant uses of force, seclusion or non-physical restraint are recorded on CPOMS the same day, and parents/carers are informed the same day where possible. Full procedures, the four-part decision framework and prohibited practices are in Appendix H (Part 1). See also the Physical Intervention and Seclusion Policy.

9.8 Absconding and missing from education

Absconding is a safeguarding event before it is a behaviour event. A student who leaves the site without permission is, until accounted for, a child missing from education or care, and

our response follows KCSIE 2026 and Working Together 2026. Every student has an absconding risk assessment recording their risk level and personal risk indicators. When a student absconds, staff alert the Headteacher/DSL immediately, search the building and grounds, review the student's risk level, inform parents/carers, and – where safe – keep the student in sight from a distance without chasing, grabbing or detaining them, escalating to police and other agencies as risk requires. We do not chase, because pursuit can escalate a student's flight response, push them into traffic or higher-risk environments, and physically preventing a student from leaving a public space without a safeguarding rationale may constitute false imprisonment and breach the Human Rights Act. Repeated absconding is treated as information about unmet need, prompting a deeper support-plan review rather than sanction escalation. All incidents are recorded on CPOMS and Arbor, and the DSL monitors absconding data for patterns. Full operational procedures are in Appendix H (Part 2) and the Behaviour and Anti-Bullying Policy.

10. Students with special educational needs and/or disabilities (SEND)

10.1 Additional safeguarding challenges

Pupils with SEND can face additional safeguarding challenges, and additional barriers can exist to recognising abuse and neglect in this group: indicators such as behaviour, mood and injury may be assumed to relate to the child's disability without further exploration; pupils may be more prone to peer isolation and disproportionately affected by bullying without outwardly showing signs; and communication barriers can make disclosure harder. We offer extra pastoral support (outlined in the SEND Policy), and local support is available on the Local Authority "Local Offer" web pages.

10.2 DSL and SENCO collaboration

The DSL and SENCO work closely to identify and address vulnerabilities. They hold termly meetings (as a minimum) to share relevant information about pupils with SEND who may have safeguarding concerns; the SENCO may be involved in investigations where a concern involves a pupil with SEND; and the DSL shares relevant safeguarding information to help create appropriate EHC plan targets while maintaining confidentiality. Any staff member with a concern about a pupil with SEND follows child protection procedures and speaks to the DSL first, who decides whether to involve the SENCO and other staff.

10.3 Whole-school approach, working with parents, and recording

All staff are trained to understand the specific vulnerabilities of pupils with SEND, how common types of SEND can create safeguarding vulnerabilities, the signs of abuse and neglect to look out for, and how to adapt safeguarding approaches. The DSL leads conversations with parents/carers, but the SENCO may join or support these where they have a stronger relationship with the family or where specialist understanding is needed. The school uses its management information system to track pupils with SEND who also have safeguarding concerns, build a holistic view, ensure SEND issues are not misinterpreted as safeguarding concerns (and vice versa), and set appropriate notifications.

Staff receive training to identify where a pupil's SEND might mask a safeguarding issue, or a safeguarding issue might hide underlying SEND – for example bruising related to poor motor skills or potential abuse, risky online behaviour linked to SEND, self-harm, or persistent absence that could indicate safeguarding issues or be due to anxiety or autism.

11. Children with a social worker (current and previous)

11.1 Recognition and support

Pupils may need a social worker due to safeguarding or welfare needs, and experiences of adversity and trauma can leave them vulnerable to further harm and create barriers to attendance, learning, behaviour and mental health. The DSL and all staff work with and support social workers to help protect vulnerable children. The DSL holds information about social workers working with children at the school on CPOMS, which informs decisions about safeguarding and welfare, including pastoral and academic support.

11.2 Decision-making and contact plans

Where a pupil has a social worker, the DSL always considers this to ensure decisions are made in the pupil's best interests – for example responding to unauthorised absence or missing education where there are known safeguarding risks, providing pastoral and academic support, and using intervention to build confidence and engagement. We have contact plans for children with a social worker, and other children we have safeguarding concerns about, for circumstances where they will not be attending school. Each child has a recorded plan (developed with the social worker where applicable) setting out how often the school will make contact (at least once a week), which staff will make contact (as far as possible, staff who know the family well), and how (phone, doorstep visits, or both). Plans are agreed with children's social care where relevant and reviewed regularly; if we cannot make contact, we follow the non-attendance procedure in the Attendance Policy.

11.3 Children who have previously had a social worker

Children who have previously had a social worker may continue to be vulnerable and require ongoing support. The DSL maintains awareness of these children, considers their history when making safeguarding decisions, ensures pastoral and academic support continues, monitors their wellbeing, attendance, behaviour and progress, and works with relevant agencies where appropriate.

12. Looked-after and previously looked-after children

We ensure staff have the skills, knowledge and understanding to keep looked-after and previously looked-after children safe. Appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children's social workers and relevant virtual school heads. We have appointed an appropriately trained Designated Teacher to promote the educational achievement of looked-after and previously

looked-after children, who works closely with the DSL to ensure safeguarding concerns are responded to quickly and effectively and works with virtual school heads to promote educational achievement.

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or are perceived to be) lesbian, gay, bisexual or questioning their gender can be targeted by other children, are more likely to experience poor mental health, and may lack trusted adults with whom they can be open. Any concerns should be reported to the DSL. We aim to reduce additional barriers, create a culture where pupils can speak out, take a strong, proactive stand against all forms of bullying (including misogyny and misandry), and avoid rigid rules based on gender stereotypes. See our Behaviour Policy for how we prevent bullying based on gender or sexuality.

When supporting pupils we actively involve parents/carers (unless this would constitute a greater risk to the child), encourage families to seek clinical help early, and include any available clinical advice. We take a cautious approach, recognising unknowns around the impact of social transition, and consider potential wider vulnerabilities (complex mental health needs, psychosocial needs, autism, ADHD) and the risk of bullying. We adhere to statutory guidance and comply with our distinct but interacting obligations under safeguarding legislation and equality and human rights law. We take time to understand the thoughts and feelings of children questioning their gender, remain appropriately professionally curious, and maintain flexibility. Staff will not adopt any changes relating to social transition unless a decision has been made by the school and parents/carers have been involved (except in rare circumstances where this would constitute a greater risk). For comprehensive guidance – including social transition, facilities requirements and recording obligations – see Appendix G.

14. Record keeping

All safeguarding concerns, discussions, decisions and rationale must be recorded in writing; if in doubt about recording requirements, speak to the DSL. The school records on CPOMS (all safeguarding and welfare concerns, incidents and RPIs), Arbor (behaviour logging), and CPOMS Staff Safe (low-level concerns about staff – see Appendix F).

14.1 Recording a disclosure or concern

When a child makes a disclosure or you have a concern, record on CPOMS as soon as possible: date, time and place; the words used by the child (verbatim if a disclosure); non-verbal behaviour observed; injuries (using the body map function); statements and observations (not interpretations or assumptions); and any other relevant documents (which may be needed by a court). Assign the report to the DSL via CPOMS without delay. Full staff guidance is in Appendix I.

14.2 DSL record keeping and access

The DSL ensures all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. CPOMS records include a clear and comprehensive summary of the concern, how it was followed up and resolved, actions, decisions and outcomes, a chronology of events, and multi-agency involvement. Information is kept confidential and stored securely. General student information held on school systems including Arbor is accessible only to authorised staff according to their role. Child protection records on CPOMS are confidential and accessible only to the DSL, deputy DSLs, Headteacher, National Head of Safeguarding, or others with a legitimate professional need to know as determined by the DSL. Individual risk assessments, welfare plans, safety plans and behaviour support plans on Arbor may be accessed by staff responsible for implementing, monitoring or reviewing the control measures, who must familiarise themselves with relevant plans and follow all specified actions. Safeguarding and risk information is shared on a need-to-know basis only.

14.3 Transferring records

When a child with safeguarding concerns moves to another school, the DSL exports the child protection file from CPOMS promptly, securely and separately from the main pupil file; includes a summary of current concerns, relevant context and ongoing support needs; considers which information to share with receiving staff; ensures the receiving school can assess risk and implement a support plan where information indicates risk to others (e.g. weapon-related concerns); distinguishes clearly between current and historic information; speaks to the receiving DSL where concerns are significant, complex or social services are involved; and obtains confirmation of receipt. See Appendix D (recruitment and pre-employment records) and Appendix F (records for allegations and low-level concerns).

15. Relationships, sex and health education (RSHE)

Progress Arc provides high-quality RSHE as part of our whole-school approach to safeguarding, helping pupils understand healthy relationships, recognise abuse, stay safe online, understand consent and make informed decisions about their health and wellbeing. We deliver RSHE in accordance with the Relationships Education, RSE and Health Education (England) Regulations 2019, KCSIE 2026 and the Equality Act 2010, using PoEd and the PSHE Association SEND Framework to ensure the curriculum is accessible and inclusive. Our curriculum addresses key safeguarding topics including healthy and unhealthy relationships, recognising and reporting abuse, online relationships and safety, consent and respectful behaviour, mental wellbeing, internet safety and harms (including AI-generated images, deepfakes, pornography and harmful influencers), physical health, drugs, alcohol and tobacco, and age-appropriate sex education (human reproduction, consent, contraception, sexual health). For full details of the curriculum, delivery methods and parental consultation, see our RSHE Policy, Curriculum Policy, E-Safety Policy and Behaviour and Anti-Bullying Policy.

16. Safer working practice

We embed a culture of openness, trust and transparency where the school's values and expected behaviour (as set out in the staff code of conduct) are lived, monitored and reinforced. All staff act with professionalism at all times, receive training on safer working practice, and must be familiar with the staff handbook and code of conduct. Governors, proprietors and senior leaders ensure staff can distinguish appropriate from concerning, problematic or inappropriate behaviour; empower staff to share low-level concerns (see Appendix F); address unprofessional behaviour and support early correction; provide responsive, sensitive and proportionate handling of concerns; and identify any weaknesses in the safeguarding system. Concerns or allegations are dealt with promptly, in line with local and statutory guidance.

16.1 Staff use of mobile phones

Staff may bring personal phones for their own use, limited to non-contact time when pupils are not present, and phones must remain in bags or cupboards during contact time. Staff must not take pictures or recordings of pupils on personal phones or cameras; school devices are provided to prevent personal phone use, and use of personal phones for images or recordings should be avoided at all costs. If staff accidentally take images on a personal device, they transfer them immediately to an approved school device and demonstrate to their manager that the images have been deleted.

16.2 Pupil mobile phones and data protection

The school implements a mobile phone policy where pupils do not have access to their phones at any time during the school day (including lessons, breaktimes and lunchtimes); see the Mobile Phone Policy for full details. We follow the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 when taking and storing photos and recordings. Further detail is in the E-Safety Policy, Staff Handbook and Code of Conduct, GDPR/Data Protection Policy and Mobile Phone Policy.

17. Safeguarding concerns about and allegations against staff

This section summarises our approach; full procedures for both allegations that meet the harms threshold and low-level concerns are in Appendix F. It applies to all staff, including supply teachers, trainee teachers, volunteers and contractors, and covers behaviour both in and outside school.

17.1 Allegations that meet the harms threshold

We adhere to Part 4, Section 1 of KCSIE 2026 and Local Authority Safeguarding Children Partnership guidance. An allegation meets the harms threshold where a member of staff has behaved in a way that has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved in a way that indicates they may not be suitable to

work with children. Allegations against the Headteacher are reported to the National Head of Safeguarding; allegations against any other staff member are reported to the Headteacher immediately. Do not discuss allegations with the person involved. The Headteacher or National Head of Safeguarding considers whether the concern meets the LADO threshold, refers within 24 hours if needed, makes a MASH referral if appropriate, contacts police if necessary, and refers to the DBS if a staff member is dismissed or removed.

17.2 Low-level concerns

We adhere to Part 4, Section 2 of KCSIE 2026. A low-level concern is any concern that an adult may have acted inconsistently with the staff code of conduct but does not meet the allegations threshold (for example being over-friendly with children, taking photos on personal phones, or inappropriate language). Low-level concerns are recorded on CPOMS Staff Safe; the DSL reviews and determines whether to take no action, investigate, escalate to the National Head of Safeguarding, escalate to the LADO, or escalate to HR. Records are reviewed to identify patterns, and where patterns emerge the school takes disciplinary action, refers to the LADO, or revises policies/training. Records are kept for one year after employment ends.

17.3 Supply staff, trainees and contractors

We never cease to use supply staff, trainees or contractors for safeguarding reasons without liaising with the LADO. For allegations, the Headteacher liaises with the agency/employer, leads the investigation, determines suspension or redeployment, and keeps the agency informed. For low-level concerns, the concern is recorded on CPOMS Staff Safe, the Headteacher notifies the agency/employer, and the LADO is consulted if the threshold is unclear. See Appendix F for full procedures.

18. Complaints and concerns about school safeguarding policies

Complaints against staff that are likely to require a child protection investigation are handled in accordance with our procedures for low-level concerns or allegations of abuse (see Section 17 and Appendix F). Other safeguarding-related complaints are dealt with in line with the Complaints Policy alongside this policy where applicable. For concerns about poor or unsafe practice or potential failures, see the Whistle-blowing Policy. Staff can also report concerns directly to the Head of People and People Advisor, the National Head of Safeguarding, the LADO, or the NSPCC Whistleblowing Helpline.

19. How we safeguard students attending alternative provision

Before any pupil attends alternative provision arranged by us, we complete rigorous due diligence to ensure their safety. Checks include a health and safety check of the premises; quality assurance of the curriculum/education the pupil will receive; safety checks on staff, including DBS numbers where applicable; confirmation from providers of their duty to

statutory guidance and safer recruitment; and review of safeguarding and child protection policies and procedures. After successful due diligence, a service level agreement is put in place that also outlines protocols for checks on the pupil, such as attendance. Where we place a pupil with a provider, we obtain written confirmation that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. We are aware of the national standards for non-school alternative provision and ensure any provider we use meets these standards. See the Work Experience and Alternative Provision Policy for more detail.

20. Searching students and prohibited items

20.1 Daily searches on entry

All students are searched for prohibited items when they enter the school building every day. Searches are conducted by trained staff using electronic wand devices; a same-sex staff member conducts searches where possible; staff ensure the student is comfortable throughout; a second staff member is present as a witness where possible; students who refuse to be searched are not permitted to enter the building and parents/carers are contacted immediately; and all searches are recorded on CPOMS. Any safeguarding concerns arising from searches (injuries observed, concerning items, student distress) are reported to the DSL immediately.

20.2 Prohibited items and confiscation

The following items are prohibited and will be confiscated: tobacco and vaping products (cigarettes, tobacco, vaping devices, e-cigarettes, e-liquids, lighters, matches); weapons and dangerous items (knives, blades, sharp objects, imitation weapons, fireworks); illegal substances (drugs, controlled substances, drug paraphernalia, alcohol); and other items such as pornographic materials, stolen items, and anything posing a risk to health, safety or welfare. Confiscated tobacco and vaping products are not returned directly to pupils; parents/carers are informed the same day; items may be retained for parent/carer collection or disposed of after seven days; and repeated breaches may result in further action under the Behaviour Policy. For weapons, drugs or illegal items, the DSL is informed immediately, police are contacted where appropriate, parents/carers are informed, items are handed to police or disposed of lawfully, serious sanctions are applied under the Behaviour Policy, and safeguarding referrals are made where appropriate. All confiscations are recorded on CPOMS and the DSL monitors for patterns.

20.3 Support, safeguarding and legal framework

We recognise that some young people may already be using vaping or tobacco products and that stopping can be difficult; our intention is not simply to sanction but to support pupils in making safe, healthy choices, including advice, education and signposting, one-to-one support, referral to NHS Stop Smoking Services, and educational sessions. Students can speak to their form tutor, DSL or any trusted adult. Possession of prohibited items may indicate safeguarding concerns including exploitation, peer pressure or bullying, risk of

serious violence or gang involvement, criminal exploitation (CSE, CCE, county lines), substance misuse or mental health concerns, and neglect or abuse at home; the DSL conducts a safeguarding assessment and takes appropriate action, including referrals to children's social care or police where necessary (see Section 9). This policy is based on the Education Act 1996 (s.550A) and Education and Inspections Act 2006 (s.94), Searching, Screening and Confiscation: Advice for Schools (DfE, 2024), KCSIE 2026, and the Health Act 2006 and Children and Families Act 2014. Headteachers and authorised staff have statutory power to search pupils and confiscate prohibited items. Complaints about search or confiscation should follow the Complaints Policy. Read alongside the Behaviour and Anti-Bullying, Health and Safety, and Online Safety Policies.

21. Monitoring arrangements

This policy is reviewed annually by the National Head of Safeguarding and approved by the full governing board at every review. Effectiveness is monitored through termly safeguarding audits conducted by the National Head of Safeguarding, feedback from staff, pupils, parents/carers and external agencies, analysis of safeguarding data and trends, Ofsted inspections and external reviews, and termly reports to governors on safeguarding activity. Any amendments are communicated to all staff immediately.

22. Links to other policies

This policy should be read in conjunction with the following policies and procedures. All are available on the school website, and this safeguarding policy takes precedence where there is any conflict.

Safeguarding and wellbeing: Behaviour and Anti-Bullying Policy; Online Safety (E-Safety) Policy; Health and Safety Policy; First Aid Policy; Attendance Policy; Mental Health and Wellbeing Policy.

Staff conduct and procedures: Staff Code of Conduct; Staff Handbook; Safer Recruitment Policy; Whistleblowing Policy; Complaints Policy.

Curriculum and education: RSHE Policy; Curriculum Policy; SEND Policy; Teaching and Learning Policy.

Equality and inclusion: Equality Policy; Accessibility Plan; Single Equality Scheme.

Technology and data: Mobile Phone Policy (staff and pupils); Artificial Intelligence (AI) Policy; GDPR and Data Protection Policy; Privacy Notices; Acceptable Use Policy.

Specific groups: Designated Teacher for Looked-After and Previously Looked-After Children Policy; Supporting Pupils with Medical Conditions Policy; Work Experience and Alternative Provision Policy; Physical Intervention and Seclusion Policy.

23. Sixth form (Futures) safeguarding arrangements

- This section sits within the Progress Arc sixth form provision.
- It sits within the wider policy rather than replacing it.
- It recognises the different safeguarding profile of students aged 16-19.

Progress Arc recognises that sixth form students may have different developmental, social, educational and safeguarding needs to younger students. Safeguarding arrangements will support increasing independence while maintaining appropriate protection, supervision and professional curiosity.

Staff must remember that many sixth form students are still children in law. Where a student is under 18, child safeguarding procedures apply. Where a student is 18 or over, staff will still consider vulnerability, SEND, mental capacity, exploitation, adult safeguarding, consent, welfare and preparation for adulthood.

23.1. Relationships, consent and age-appropriate discussion

Sixth form students may appropriately engage in more mature learning and discussion relating to relationships, sexual health, consent, online relationships, employment, independent travel and adulthood. Staff must ensure that content is planned, supervised and suitable for the age, maturity, SEND profile and understanding of the students involved.

Where sixth form students share facilities, activities or learning opportunities with younger students, discussions, language, social interaction and curriculum content will be risk assessed. What is appropriate for a 17-year-old may not be appropriate for a 13-year-old. Staff will plan mixed-age activity carefully and intervene where boundaries, language or behaviour become unsuitable.

23.2. Mixed-age safeguarding

- Shared spaces will be supervised according to risk, age, vulnerability and known safeguarding information.
- Relationships or concerning interactions between older and younger students will be assessed for age gap, power imbalance, coercion, consent, vulnerability and online contact.
- Staff will be alert to sexualised language, grooming, pressure, gifts, secrecy, social media contact or attempts to isolate younger students.

- Arrangements for toilets, changing areas, social times, transport and enrichment activities will consider age and vulnerability.
- Any concern involving an older student and a younger student will be recorded and reviewed by the DSL.

23.3. Independence, travel and community safety

Sixth form provision may involve increased independence, community access, independent travel, work experience or college-style expectations. Independence will be supported through risk assessment, preparation, clear boundaries and review. Staff will consider exploitation, transport risks, online contact, local area risks, missing episodes, substance misuse, peer influence and personal safety.

23.4. Employment, work experience and preparation for adulthood

Where students access employment, volunteering, work experience or community-based learning, safeguarding checks and risk assessments will be completed. Students will be taught how to report concerns in the workplace, including unsafe adults, harassment, discrimination, exploitation, bullying, inappropriate messages, pressure to keep secrets or unsafe working conditions.

23.5. Online safety for older students

Older students may have wider access to personal devices, social media, online dating, gaming, financial services and adult content. The curriculum and pastoral support will address consent, image sharing, sextortion, scams, digital footprints, AI-generated imagery, online misogyny, pornography, harmful content and reporting routes.

23.6. Mental health and transition

Arc staff will consider the mental health impact of transition to adulthood, exams, employment, relationships, family expectations, identity, independence, loneliness and online pressures. Concerns about self-harm, suicidal ideation, exploitation or significant emotional distress must be managed through safeguarding procedures.

23.7. Review of Arc arrangements

The DSL and senior leaders will review Arc safeguarding arrangements at least annually and following any significant incident. Reviews will consider age mix, shared site arrangements, student voice, incident patterns, curriculum content, community access, online safety and staff training needs

24. Key contacts

National key personnel – Progress Arc

Role	Name	Contact number	Email
National Head of Safeguarding	Kaylie Lewis	07802 462708	kaylie.lewis@progress-schools.co.uk
School DSL	Lotte Schol	01744 892 551	Lotte.schol@progress-arc.co.uk
School DDSL	Rhian Smith	01744 892 551	Rhian.smith@progress-arc.co.uk
Headteacher	Susan Fletcher	01744 892 551	Susan.fletcher@progress-arc.co.uk
Safeguarding shared mailbox			safeguarding@progress-arc.co.uk

Local Authority contacts

Service	Contact Details	Email/ website
LADO		sthelenslado@sthelens.gov.uk
Children's Social Care/ MASH	MASH: 01744 676767	MASH@sthelens.gov.uk
Out of Hours Social Care	Emergency Duty Team: 0345 050 0148	
Local Safeguarding Partnership	01744 671266	www.sthelenssafeguarding.org.uk safeguardingchildrenpartnership@sthelens.gov.uk

Emergency contacts

Service	Contact Details
Police (Emergency)	999
Police (non-emergency)	101
Ambulance / A&E	999
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Helpline	0800 028 0285
Forced Marriage Unit	020 7008 0151

Appendix A: Emergency arrangements

In any emergency affecting normal operations (public health emergencies, severe weather, fire, premises issues, staff shortages or security incidents), Progress Arc will maintain its commitment to safeguarding all children. This appendix applies to emergencies resulting in full or partial closure, significant disruption, remote or hybrid learning, changes to staffing, restrictions on premises access, or evacuation/relocation.

Decision-making

The headteacher makes emergency closure decisions, considering the impact on pupils' education and wellbeing, statutory safeguarding and health and safety responsibilities, and the need to minimise disruption and maximise safe face-to-face provision. They consult the governing board, local authority and relevant agencies (public health, police, emergency services).

Emergency safeguarding arrangements

A DSL or deputy is always available (on-site or contactable), the Emergency Response Plan is activated, clear communication channels are established with staff, parents/carers and agencies, and accurate records of decisions and actions are kept. Contact details are reviewed and updated (at least two emergency contacts per pupil), contact plans are maintained for vulnerable children, accurate attendance records are kept (on-site, remote, absent), and risk assessments are conducted for operational changes. We continue reporting concerns to the local authority and agencies, ensure all staff (including temporary staff and volunteers) understand safeguarding procedures, maintain safer recruitment, and continue following all procedures in the main policy. If the school remains open, a minimum of two staff (at least one teacher) are on site, alternative arrangements are considered (supply staff, staff sharing, combined classes), appropriate staff-to-pupil ratios are maintained, and staff with specific qualifications (first aid, SEN expertise) are available.

Contact plans, remote learning and communication

For vulnerable children not attending during an emergency, designated staff (preferably those who know the family) make contact at least weekly (more frequently based on risk assessment) by phone, video call or doorstep visit, recording all attempts on CPOMS, following escalation procedures if unable to make contact, working with social workers and monitoring engagement with remote learning. For remote learning, staff follow the E-Safety Policy and Code of Conduct, conduct live sessions professionally and safely, maintain appropriate boundaries, use only school-approved platforms, and maintain filtering, monitoring and secure transmission of sensitive information. Pupil-safety measures include parent/carer guidance on online safety, online safety education in remote learning, reporting through normal procedures, and monitoring engagement and wellbeing. In an emergency we inform parents/carers as soon as possible about closures or changes, using multiple methods (email, text, phone, website, social media, LA website), notify the local authority through the designated portal, and provide regular updates on the nature

and expected duration of the emergency, arrangements for vulnerable pupils, remote learning expectations, how to contact the school, and safeguarding procedures in place.

Premises, health and safety, and review

During premises-related emergencies we conduct thorough risk assessments before reopening, ensure statutory requirements are met (water, heating, safe access), follow the business continuity plan, work with relevant authorities (building control, fire service, environmental health), and consider partial opening if some areas are safe. Personal Emergency Evacuation Plans (PEEPs) are kept up to date and accessible, reviewed and adapted as necessary, with designated staff available to assist and changes communicated to pupils and parents/carers. Throughout, we maintain records of decisions and rationale, actions taken, attendance, safeguarding concerns and referrals, contact with vulnerable families, communication with parents/carers and agencies, risk assessments and staff deployment. During the emergency we review arrangements regularly and communicate changes; afterwards we review effectiveness, identify lessons learned, update policies, provide support for affected pupils and staff, and report to governors. Read alongside the Emergency Response Plan, Business Continuity Plan, E-Safety Policy, Remote Learning Policy, Attendance Policy, Health and Safety Policy and Staff Code of Conduct.

Appendix B: Child-on-child abuse

Child-on-child abuse is any abuse of a child by another child or children. We take a zero-tolerance approach to sexual violence and sexual harassment – it is never acceptable and will not be tolerated. We recognise that even if we do not receive reports, it does not mean child-on-child abuse is not happening, and we encourage anyone, especially pupils, to come forward with concerns.

Understanding harmful sexual behaviour (HSB)

Harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or violence. We understand typical stages of sexual development, identify when behaviour deviates from what is developmentally appropriate, and respond promptly. Staff receive training to recognise the continuum from HSB through to sexual harassment and violence, using resources from the NSPCC and specialist organisations.

Types of child-on-child abuse

This includes, but is not limited to: bullying (including cyberbullying and prejudice-based or discriminatory bullying); abuse in intimate relationships between peers; physical abuse (hitting, kicking, shaking, biting, hair pulling); sexual violence (rape, assault by penetration, sexual assault); sexual harassment (sexual comments, remarks, jokes, online harassment); causing someone to engage in sexual activity without consent; making or sharing nudes and semi-nudes (including AI-generated images and deepfakes); upskirting; and initiation/hazing type violence and rituals. All children are capable of abusing their peers; girls are more likely to be victims and boys perpetrators. All child-on-child abuse is unacceptable and taken seriously.

Prevention

All staff receive training to recognise that children can abuse other children (online or in person, at school or outside), confidently recognise indicators and signs, understand the school's policy and procedures, challenge inappropriate behaviour (even if it appears innocuous), and never downplay behaviours as “just banter”, “having a laugh”, “part of growing up” or “boys being boys”. We minimise opportunities through a robust behaviour policy with zero tolerance, training staff to challenge inappropriate behaviour, recognising abuse may occur even if unreported, embedding wellbeing, SMSC and RSHE in the curriculum, ensuring well-promoted and accessible reporting systems, and providing safe spaces for vulnerable children to speak out. We recognise some children may be more vulnerable (those who have experienced abuse, children with SEND, children in care, LGBTQ+ children) and protect them by always providing safe spaces to share concerns.

How to report concerns

If a pupil witnesses or experiences child-on-child abuse, they can speak to a trusted member of staff, parent or trusted adult, disclose verbally or in writing, or email

safeguarding@progress-schools.co.uk. All victims are taken seriously, supported and kept safe, and will never be made to feel they are creating a problem by reporting.

Responding to allegations

We adhere to KCSIE 2026 and DfE guidance “Sexual violence and sexual harassment between children in schools and colleges” (2021); our starting point is always zero tolerance. The DSL will consider the victim’s wishes, the nature of the alleged incident(s) and whether a crime may have been committed, the ages and developmental stages of those involved, any power imbalance, the impact on the victim, whether it is a one-off or sustained pattern, ongoing risks, and the wider context (e.g. links to child criminal or sexual exploitation). The DSL may seek further information from those involved and witnesses, undertake a risk and needs assessment, manage the concern internally, organise meetings with relevant staff and agencies, refer to Early Help, make a MASH referral, liaise with social workers, report to police, and liaise with specialist services. For sexual violence, an immediate risk and needs assessment is made. All incidents are recorded on CPOMS.

Making or sharing nudes and semi-nudes

This covers consensual or non-consensual making or sharing of nude/semi-nude images or videos, including AI-generated images and deepfakes. All such incidents mandate a safeguarding response and must be reported to the DSL immediately. Staff must NOT view, copy, print, share, store or save the imagery; delete it or ask the pupil to delete it; ask the pupil to disclose information about the imagery; share information with other staff or parents/carers; or blame or shame any young people involved. Explain that you need to report it and reassure the pupil they will receive support.

The DSL holds an initial review to determine whether there is immediate risk, whether referral to police/children’s social care is needed, whether to view the image(s) (in most cases they should not be viewed), what further information is required, whether images were shared widely and via what platforms, whether immediate action is needed to delete/remove images, relevant facts about the pupils involved, whether to contact another school/setting, and whether to contact parents/carers (in most cases, yes). Immediate referral to police/children’s social care is made if an adult is involved; if there is reason to believe coercion, blackmail, grooming or capacity concerns; if content depicts unusual or violent sexual acts for the developmental stage; if the imagery involves sexual acts and any pupil under 13; or if a pupil is at immediate risk of harm. If none apply, the DSL may respond without involving police/children’s social care. The DSL conducts further review to establish facts and assess risk, informs parents/carers at an early stage (unless this puts the pupil at risk), makes a police referral via local arrangements, and records all incidents on CPOMS. Pupils are taught about nudes/semi-nudes in RSHE and computing, covering what it is and how encountered, consequences (including when it is abuse or online sexual harassment), risks of AI-generated/deepfake images, legality and reputational risks, and strategies to manage requests or pressure.

Artificial intelligence

We recognise AI has many uses but may facilitate abuse (bullying, grooming, deepfakes), and we treat any use of AI to access harmful content or bully pupils in line with this policy and the Behaviour Policy. Staff must be aware of AI risks, carry out risk assessments for new AI tools, and apply filtering and monitoring requirements to AI use.

Supporting victims and alleged perpetrators

Victims receive appropriate ongoing support during and after investigation, protection from further bullying, harassment or abuse, maintenance of normal routine where possible, and regular review of support; if a victim moves setting, the DSL shares necessary information so support continues. We also safeguard and support alleged perpetrators: we ensure they continue to receive suitable education (which may include a Twilight timetable, remote education, or education at another Progress Arc site), recognise they may be being abused themselves, put in place a risk reduction plan, take advice from children's social care, specialist services and police, follow the Behaviour Policy for sanctions where appropriate, undertake risk assessment if cautioned or convicted, and share information with a new setting if they move.

Working with parents and whole-school response

Parents/carers are informed of incidents unless this puts a child at greater risk, and children are encouraged to speak to parents unless it puts them at greater risk. We keep detailed records on CPOMS, look for patterns of concerning behaviour, and where patterns are identified take action such as dedicating more teaching time to the issue, delivering additional staff training, and providing further opportunities for student discussion. We review our systems, training and policies following incidents to identify lessons learned. Read alongside the Behaviour and Anti-Bullying Policy, RSHE Policy, Online Safety Policy and Searching and Confiscation Policy.

Appendix C: Types of abuse

Abuse and safeguarding issues are rarely standalone events; in most cases multiple issues overlap. If staff suspect any form of abuse, they follow the procedures in Section 8 and report to the DSL immediately.

Core types of abuse

Physical abuse involves hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, and may include fabricating symptoms or deliberately inducing illness.

Emotional abuse is persistent emotional maltreatment causing severe adverse effects on emotional development. It may involve conveying that a child is worthless, unloved or valued only to meet another's needs; silencing or ridiculing them; age-inappropriate expectations or overprotection; seeing or hearing ill-treatment of another; and serious bullying (including cyberbullying) or exploitation.

Sexual abuse involves forcing or enticing a child into sexual activities, whether or not the child is aware. It may involve physical contact (assault by penetration, rape, oral sex, masturbation, kissing, rubbing, touching) or non-contact activities (involving children in sexual images, watching sexual activities, grooming online or offline). It can be perpetrated by adults or children of any gender.

Neglect is persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It may involve failing to provide adequate food, clothing or shelter; protect from physical and emotional harm; ensure adequate supervision; or ensure access to medical care.

Children missing from education

A child missing from education, particularly repeatedly, can indicate abuse, neglect, sexual or criminal exploitation, mental health problems, substance abuse, radicalisation, FGM or forced marriage. Children particularly at risk include those at risk of harm, forced marriage or FGM; from Gypsy, Roma, Traveller or service families; who go missing or run away from home/care; supervised by youth justice; or from new migrant families. We follow procedures for unauthorised absence (see Attendance Policy), always follow up with parents/carers, maintain at least two up-to-date emergency contacts, and inform the LA if a child leaves without a new school named (or refer to social care/police if at risk of harm).

Exploitation and serious violence

Child Criminal Exploitation (CCE) is abuse where an individual or group exploits an imbalance of power to coerce a child into criminal activity in exchange for something the

victim needs or wants, for financial advantage, or through violence/threats. Forms include county lines, cannabis factories, shoplifting, vehicle crime, serious violence and financial exploitation. Indicators include unexplained gifts or possessions, associating with others involved in exploitation, changes in emotional wellbeing, drug/alcohol misuse, going missing or regularly late, and missing school. County lines involves gangs exporting illegal drugs using dedicated phone lines and exploiting children and vulnerable adults through coercion, violence and weapons.

Child Sexual Exploitation (CSE) is child sexual abuse where an individual or group exploits an imbalance of power to coerce a child into sexual activity in exchange for something the victim needs or wants, for financial advantage, or through violence/threats. It can affect any child, including 16–17 year olds, and may occur online or offline, with or without physical contact. Additional indicators to CCE include an older boyfriend/girlfriend and STIs or pregnancy.

Serious violence: staff should be aware of the risks of physical assault and carrying/using weapons. Signs include increased absence, changes in friendships or relationships with older individuals, decline in performance, self-harm or wellbeing changes, and unexplained injuries or gifts. Staff must report concerns about a child carrying/using a weapon (or expressing intent) to the DSL immediately. Risk factors include being male, frequent absence or exclusion, child maltreatment and a history of offending.

Other specific issues

Child abduction and community safety incidents: child abduction is the unauthorised removal or retention of a minor, which can be committed by parents, family, known persons or strangers. Report concerns about abduction or community safety (e.g. loitering, unknown adults engaging children) to the DSL immediately.

Cybercrime: criminal activity using computers/internet, including unauthorised access (hacking), denial-of-service attacks and making/supplying malware. Children with computing skills may inadvertently or deliberately engage in cybercrime; the DSL may refer to the Cyber Choices programme.

Domestic abuse: any incident or pattern of controlling, coercive or threatening behaviour, violence or abuse between those aged 16+ who are or have been intimate partners or family members. All children can witness and be adversely affected by domestic abuse. Through Operation Encompass, police share information about domestic incidents involving our pupils with the DSL, enabling early intervention and support.

Homelessness: being homeless or at risk presents real risk to a child's welfare. The DSL is aware of local housing authority contacts and makes referrals to children's social care

where a child is harmed or at risk. The school is aware of the temporary accommodation notification duty.

So-called “honour”-based abuse (HBA): incidents or crimes committed to protect family or community honour, including FGM, forced marriage and breast ironing. All forms are abuse and will be escalated as such.

Female genital mutilation (FGM): see Section 9.1 for procedures. Indicators that FGM has occurred include a pupil confiding it has taken place, difficulty walking/sitting/standing, frequent urinary/menstrual/stomach problems, avoiding PE or repeated absence, and increased emotional or psychological needs. Indicators of risk include a family history of FGM, FGM practised in the community/country of origin, a mother, sibling or cousin having undergone FGM, and talk of a “special procedure” or long holiday to a country where FGM is prevalent.

Forced marriage: forcing someone into marriage is a crime; the legal age is 18. Staff are aware of the “one chance” rule – they may only have one chance to save a victim. If suspected, speak to the pupil in a secure, private place and report to the DSL, who will activate safeguarding procedures and contact the Forced Marriage Unit (020 7008 0151 or fmufco.gov.uk).

Private fostering: a private arrangement for the care of a child under 16 (under 18 if disabled) by someone other than a parent or close relative for 28+ days. Parents and carers have a legal duty to inform the LA at least six weeks before the arrangement starts, and schools have a mandatory duty to report where they are aware of or suspect private fostering. Staff notify the DSL, who will speak to the family and inform the LA.

Preventing radicalisation: radicalisation is the process by which a person comes to support terrorism or extremist ideologies. Signs include refusing to engage with, or becoming abusive to, different peers; susceptibility to conspiracy theories; changes in friendships or appearance; rejecting previously enjoyed activities; isolating from family/friends; unwillingness to discuss views; a disrespectful attitude or increased anger; accessing extremist material online; and expressing sympathy for extremist ideologies. See Section 9.2.

Appendix D: Safer recruitment

We adhere to Part 3 of KCSIE 2026 at all times and consider safeguarding throughout recruitment. All information on checks is recorded on the school's single central record (SCR), with copies held in personnel files where appropriate.

Pre-appointment

Job advertisements include our commitment to safeguarding, confirmation that checks will be undertaken, the safeguarding responsibilities of the post, whether the post is exempt from the Rehabilitation of Offenders Act 1974, and a statement that it is an offence to apply if barred from regulated activity (for regulated activity roles). Application packs include the child protection policy and policy on the employment of ex-offenders. Applicants must provide personal details, current and former names, address, national insurance number, present/last employment and reason for leaving, full employment history since leaving school (including gaps), qualifications with awarding body and date, details of referees, and a statement of suitability. CVs cannot replace application forms (they may only supplement them).

Shortlisting, selection and references

At least two people carry out shortlisting and explore concerns including inconsistencies and gaps. Shortlisted candidates complete a self-declaration of any criminal record or information making them unsuitable to work with children, have references sought before interview (including for internal candidates), and have references scrutinised and concerns resolved before appointment. References ask specific questions about suitability to work with children; when providing references, we confirm suitability and provide facts of any substantiated safeguarding allegations.

New staff checks

We verify identity (with awareness of name changes; best practice is a birth certificate), mental and physical fitness for the role, right to work in the UK (including EU nationals), and professional qualifications. We obtain an enhanced DBS check with barred list information (for regulated activity), a separate barred list check if starting before the DBS certificate is available, overseas checks where applicable, and further checks if the person lived/worked outside the UK. We check that teaching candidates are not subject to a prohibition order and management candidates are not subject to a section 128 direction.

Important – changes to regulated activity (Crime and Policing Act 2026): regulated activity now includes any person who frequently teaches, trains, instructs or supervises children; does so overnight or on more than three days in a 30-day period; carries out paid or unsupervised unpaid work regularly providing opportunity for contact with children; engages in intimate/personal care or overnight activity (even once); provides advice or guidance on physical, emotional or educational wellbeing; or drives a vehicle only for children. The supervision exemption has been removed.

Existing staff, agency and contractors

We maintain ongoing vigilance beyond recruitment and encourage staff to discuss matters with safeguarding implications, including things seen or heard online. If concerns arise about existing staff suitability, we carry out all relevant checks as if they were new staff, and we refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult where the relevant criteria are met. For agency and third-party staff, we obtain written confirmation that necessary safer recruitment checks have been carried out and check the person presenting for work is the same person on whom checks were made. For contractors, we ensure appropriate DBS checks (enhanced with barred list for regulated activity; enhanced without barred list for regular contact that is not regulated activity; basic considered for no regular contact); for self-employed contractors we obtain or view the DBS certificate; unchecked contractors are not allowed to work unsupervised and cannot engage in regulated activity; we check identity of all contractors on arrival and do not keep copies of checks longer than six months.

Trainees, volunteers, governors and visitors

For salaried trainees we carry out all necessary checks; for fee-funded trainees we obtain written confirmation from the training provider that checks are completed and the trainee judged suitable; all trainees are appropriately supervised on placement. Under the Crime and Policing Act 2026 the supervision exemption is removed, so any volunteer who frequently teaches, trains, instructs or supervises children is now in regulated activity and requires an enhanced DBS check with barred list information; we never leave unchecked volunteers unsupervised or in regulated activity, obtain enhanced DBS with barred list for all volunteers in regulated activity, and carry out and retain a risk assessment for volunteers not in regulated activity. Governors have an enhanced DBS (with barred list if in regulated activity), a section 128 check (for proprietors, trustees, local governors with management responsibilities and members), the Chair's DBS countersigned by the secretary of state, an identity check, a right to work check, and other checks if they lived/worked outside the UK. All visitors verify identity to staff satisfaction, leave belongings (including mobile phones) in a safe place, and sign the visitors' book and wear a visitor badge; unknown visitors have credentials and reason for visiting checked before entry; professional visitors show photo ID and their organisation provides annual written confirmation of enhanced DBS with barred list; all other visitors (including speakers) are accompanied by staff at all times. We will not invite speakers known to disseminate extremist views. For work experience, due to Crime and Policing Act 2026 changes we carry out barred list checks on individuals who supervise pupils under 16 where they engage in regulated activity, and we assess each placement individually based on the nature of supervision, frequency of activity and whether it is regulated activity. When placing pupils with alternative provision, we obtain written confirmation the provider has carried out appropriate safeguarding checks and ensure providers meet the national standards for non-school alternative provision.

Appendix E: Online safety

Teaching pupils to stay safe online and keeping children safe online in school is a crucial part of safeguarding. We take a whole-school approach that protects and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns. Our approach runs through every aspect of our work, including curriculum planning and RSHE, teacher training, the role of the DSL, and parental engagement. This appendix complements our separate E-Safety Policy, which staff read alongside the Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction, with regular updates and formal annual training. The DSL takes lead responsibility for online safety, attends training to understand the unique risks, and the governing board reviews online safety annually.

Risks to children

Online safety risks fall into four areas: content (exposure to illegal, inappropriate or harmful content, e.g. pornography, fake news, racism, misogyny, misandry, self-harm, suicide, anti-Semitism, radicalisation and extremism); contact (harmful online interaction, e.g. peer pressure, commercial advertising, and adults posing as children to groom or exploit); conduct (personal online behaviour increasing the likelihood of harm, e.g. making, sending and receiving explicit images, consensual and non-consensual sharing of nudes and semi-nudes, and online bullying); and commerce (online gambling, inappropriate advertising, phishing and financial scams). Risks may also include the use of generative AI, which can facilitate harmful online interaction. We refer to these four areas when planning our approach.

Filtering and monitoring

We use an external IT provider (CNS) with the required safeguards in place, operating filtering systems on all devices, contactable at any time to block content. Encryption and security levels include MFA, Cyber Essentials, data and email sensitivity labelling, and Microsoft E5 licences (Microsoft Defender for schools – Identify, Protect, Detect, Respond and Recover). The effectiveness of filtering and monitoring is reviewed at least once every academic year by the senior leader responsible, with support from the DSL and IT, and records are kept. Induction training covers expectations, roles and responsibilities, and students are not left to use devices unsupervised. We are mindful that “over-blocking” can lead to unreasonable restrictions; DSLs understand the system and monitor strategies that meet safeguarding requirements. Our filtering and monitoring also apply to AI use, in line with statutory guidance, and governors/proprietors review the provision annually.

Mobile phones, remote learning and curriculum

The school implements a mobile phone policy where pupils do not have access to their phones at any time during the school day; see the Mobile Phone Policy for how phones are stored, consequences for non-compliance, exceptions (e.g. medical reasons) and communication with parents during the day. Staff mobile phone use is covered in Section

16. Safeguards for remote teaching are in the E-Safety Policy. Our RSHE programmes cover online harms including sharing images (including AI-generated images and deepfakes), pornography, misogynistic influencers, and when and where to seek help, alongside age-appropriate lessons on staying safe online, the risks of social media, recognising and reporting online abuse, digital literacy and critical thinking, and understanding consent in an online context.

Reporting, working with parents and review

Pupils, parents or staff with concerns about online safety, or who need to make a disclosure, should speak to the DSL or deputy without delay (contacts in Section 23); pupils can also speak to any trusted adult or use safeguarding@progress-schools.co.uk. We share information with parents/carers about the systems we use to filter and monitor online use, what we ask children to do online and the sites they will access, who from the school (if anyone) their child will interact with online, how to support their child at home, and where to get further support. We recognise that technology and related risks evolve rapidly, so we carry out an annual review of our approach, supported by an annual risk assessment reflecting the risks our children face, covering the effectiveness of filtering and monitoring, staff training needs, curriculum coverage, incident analysis, and emerging risks and technologies (including AI). For more information see Annex A of KCSIE 2026, our E-Safety Policy, our Acceptable Use Policy and the Teaching Online Safety in Schools guidance.

Appendix F: Allegations and concerns about staff

This appendix applies to all concerns and allegations about members of staff, including supply teachers, trainee teachers, volunteers and contractors. It covers both serious allegations that meet the harms threshold and low-level concerns that do not.

Part 1: Understanding the difference

Allegations that meet the harms threshold are serious allegations where a member of staff has behaved in a way that has harmed, or may have harmed, a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way that indicates they may pose a risk of harm; or behaved in a way that indicates they may not be suitable to work with children. These require immediate referral to the Local Authority Designated Officer (LADO) and follow the procedures in Part 2.

Low-level concerns do not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct (including inappropriate conduct outside of work) and does not meet the allegations threshold or is otherwise not serious enough to consider a LADO referral. These are recorded using CPOMS Staff Safe and follow the procedures in Part 3.

Part 2: Allegations that meet the harms threshold

This applies to all cases in which it is alleged that a current member of staff has behaved in a way that meets the harms threshold, regardless of whether the alleged abuse took place in school or elsewhere. Allegations against a teacher who is no longer teaching, and historical allegations of abuse, will be referred to the police. We deal with any allegation quickly, fairly and consistently, providing effective child protection while supporting the individual, applying common sense and judgement.

Reporting: any allegation that meets the harms threshold must be reported immediately to the headteacher (or chair of governors if about the headteacher). The headteacher immediately contacts the LADO, does not investigate before speaking to the LADO, and informs the National Head of Safeguarding without delay. Do not investigate the allegation yourself, speak to the person about whom the allegation has been made, speak to potential witnesses, or speak to any children involved.

Suspension: suspension is not the default and is only considered where there is reason to suspect a child is at risk of harm or the case is so serious it might be grounds for dismissal. We only suspend if all other options have been considered and there is no reasonable alternative, seeking views from the LADO, police and/or children's social care. Alternatives

based on risk include redeployment so the individual has no direct contact with the child, providing an assistant when the individual has contact with children, redeploying to alternative work without unsupervised access, moving the child(ren) to other classes (making clear it is not a punishment and consulting parents), or temporarily redeploying to another Progress Arc site.

Outcome definitions: substantiated (sufficient evidence to prove the allegation); malicious (sufficient evidence to disprove and a deliberate act to deceive); false (sufficient evidence to disprove); unsubstantiated (insufficient evidence to prove or disprove – this does not imply guilt or innocence); unfounded (no evidence or proper basis supporting the allegation).

Procedure: the headteacher (case manager – or chair of governors if the allegation is against the headteacher) will immediately discuss the allegation with the LADO to agree a course of action and whether to involve police and/or children's social care; inform the National Head of Safeguarding (who provides oversight and support; inform the accused of the concerns and likely course of action after speaking to the LADO (sharing only what has been agreed where police/social care are involved); consider whether suspension is justified or whether alternatives can be put in place; record the rationale for any suspension with the LADO, providing written confirmation within one working day and a named contact; where no further action is taken, record and justify the decision and agree with the LADO what to put in writing; where further action is needed, take steps as agreed with the LADO; provide effective support for the individual, including a named representative; inform parents/carers of the child(ren) involved as soon as possible (following agreement with social care/police), advising them of confidentiality requirements while investigations are ongoing; keep parents informed of progress and outcome (in confidence) where there is no criminal prosecution; make a DBS referral where the individual has harmed or poses a risk of harm; immediately suspend from teaching any individual subject to a Secretary of State interim prohibition order pending the Teaching Regulation Agency findings; and, where police are involved, ask at the start whether consent can be obtained to share statements and evidence for use in the school's disciplinary process.

Supply, trainee and contracted staff: we never cease to use such staff for safeguarding reasons without first finding out the facts and liaising with the LADO. For supply teachers, the governing board discusses with the agency whether to suspend or redeploy while the school investigates; we involve the agency fully but lead on collecting information for the LADO, address information sharing so previous concerns are taken into account, inform the agency of our allegations management process, and invite the agency's HR manager to meetings as appropriate. For fee-funded trainees we inform the training provider and work with them to determine appropriate action, with the school leading the investigation. For contracted staff we inform the contractor's employer and work with them, with the school leading the investigation where the individual works on school premises.

Commented [CB1]: As above. We don't state individual names in policies

Timescales: cases clearly unsubstantiated or malicious are resolved within one week; where no formal disciplinary action is required, appropriate action is instituted within three working days; where a disciplinary hearing is required and can be held without further investigation, it is held within 15 working days.

After investigation: the case manager discusses with the LADO whether further or disciplinary action is appropriate. If an allegation is substantiated and the individual is dismissed or the school ceases to use their services, the case manager and personnel adviser discuss with the LADO whether to make a DBS referral (they must refer where the individual has harmed or poses a risk of harm), and for teaching staff whether to refer to the Teaching Regulation Agency – mindful of the Public Sector Equality Duty. Where a suspended individual returns to work, the case manager considers how best to facilitate this and manage contact with the child(ren) who made the allegation, if still attending.

Unsubstantiated or malicious allegations: if an allegation is shown to be deliberately invented or malicious, the headteacher (or appropriate person for allegations against the headteacher) considers whether disciplinary action against the pupil is appropriate, or whether the police should consider action against those who made the allegation, even if not a pupil.

Confidentiality: we make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is investigated, taking advice from the LADO, police and children's social care to agree who needs to know, how to manage speculation and gossip, what may be given to the wider community to reduce speculation, and how to manage press interest.

Record-keeping: the case manager maintains clear records on the individual's confidential personnel file for the duration of the case, including a summary of the allegation, how it was followed up and resolved, and notes of actions, decisions and justifications. Where records concern allegations of sexual abuse, we preserve them for the Independent Inquiry into Child Sexual Abuse (IICSA) and retain all other records at least until normal pension age or ten years from the allegation if longer. Records of a malicious allegation are deleted from the personnel file. We will not refer in employer references to any allegation proven false, unsubstantiated or malicious. Learning lessons applies to all cases (not just substantiated ones); we review with the LADO whether improvements can be made, including consideration of the decision to suspend, the duration of suspension, and whether future investigations could be carried out without suspension.

Part 3: Low-level concerns

Examples of low-level concern behaviour include being over-friendly with children; having favourites; taking photographs of children on a mobile phone; engaging with a child one-to-one in a secluded area or behind a closed door; using inappropriate sexualised, intimidating or offensive language; discussing personal or sexual relationships with or in the presence of

pupils; making sexual remarks to or about a pupil; and sharing inappropriate images with pupils. Such behaviour can exist on a wide spectrum, from inadvertent or thoughtless, through behaviour that may look inappropriate but might not be in specific circumstances, to that which is ultimately intended to enable abuse.

Reporting these concerns responsibly helps create a culture of openness, trust and transparency; identify concerning behaviour early; minimise the risk of abuse; ensure adults are clear about professional boundaries; and protect staff from false allegations or misunderstandings. All low-level concerns are recorded on CPOMS Staff Safe with as much detail as possible (names, details, context, date, time, location, witnesses and any action taken); the concern is automatically escalated to the DSL. A low-level concern about the headteacher is recorded and escalated to the chair of governors; one about the DSL is reported directly to the headteacher. Staff are encouraged to self-report if they find themselves in a situation that could be misinterpreted or that falls below expected standards, as this demonstrates awareness and a willingness to maintain high standards.

DSL response: when a low-level concern is recorded, the DSL reviews it within 24 hours (or the next working day), speaks to the person reporting it if necessary, and determines whether it is consistent with the code of conduct with no further action, constitutes a low-level concern to be investigated, meets the harms threshold (escalate immediately to the LADO following Part 2), or should be escalated to HR as a code of conduct issue. The DSL escalates to the National Head of Safeguarding when a pattern is identified, when the concern may meet the harms threshold, for oversight on complex cases, or when considering a LADO referral. Escalation to the LADO occurs when the concern meets or may meet the harms threshold or when advised by the National Head of Safeguarding. Escalation to HR occurs for a code of conduct breach without safeguarding implications, when disciplinary action may be appropriate, or when performance management or training is required.

Investigation and outcome: where investigation is required, the DSL speaks to the individual (unless advised not to) and any witnesses, reviews relevant records, considers the context, and consults the National Head of Safeguarding as appropriate. Outcomes may include no further action, informal discussion about professional boundaries, additional training or support, a formal monitoring period, escalation to HR, or reclassification as an allegation and referral to the LADO. The staff member is informed of the outcome, recorded on CPOMS Staff Safe.

Monitoring, confidentiality and retention: the DSL reviews all low-level concerns regularly, identifies patterns or trends, and reports patterns to the National Head of Safeguarding, considering whether they indicate a need for additional training, policy updates, reclassification or LADO referral. The National Head of Safeguarding provides oversight across all sites, identifies organisation-wide patterns, and ensures consistency. Concerns are handled sensitively and shared only on a need-to-know basis; access to CPOMS Staff Safe records is restricted to the DSL and deputies, headteacher, National Head

of Safeguarding, HR (when escalated) and the chair of governors (for concerns about the headteacher). Records are retained at least until the individual leaves employment, longer where a pattern is identified, reviewed when new concerns arise and at least annually. Low-level concerns are not included in references unless reclassified as a substantiated allegation, or a pattern amounts to wider concerns about suitability; where a pattern is identified, we consult the National Head of Safeguarding and seek HR and legal advice before including information in a reference. If a concern is found to be unsubstantiated, unfounded or malicious, the record is deleted from CPOMS Staff Safe and the personnel file (unless the individual requests retention).

Whistleblowing and support: staff who feel unable to raise a low-level concern through CPOMS Staff Safe or with the Headteacher/DSL, or who feel their concern has not been dealt with appropriately, can use the whistleblowing procedure. We support a culture where staff feel able to raise concerns: staff who report are thanked, the matter is handled sensitively and confidentially, and they are protected from victimisation; staff who are the subject of concerns are treated fairly, informed (unless advised otherwise), given the opportunity to respond, and offered appropriate support including occupational health or employee assistance. All staff receive training at induction and annually on the difference between allegations and low-level concerns, how to use CPOMS Staff Safe, when and how to escalate, and professional boundaries. This procedure is reviewed annually; staff should refer to the staff handbook for further guidance.

Summary: decision-making

Where a concern about a staff member meets the harms threshold, report immediately to the headteacher, contact the LADO, inform the National Head of Safeguarding, and follow Part 2. Where it does not, record on CPOMS Staff Safe (automatically escalated to the DSL, who reviews within 24 hours); the DSL then determines the outcome – no action needed; a low-level concern to be investigated with the outcome recorded; a pattern to be escalated to the National Head of Safeguarding; a concern that may meet the harms threshold, escalated to the National Head of Safeguarding with a LADO referral considered; or a code of conduct issue escalated to HR (informing the National Head of Safeguarding).

Appendix G: Supporting children questioning their gender

This appendix sets out our approach to supporting children who are questioning their gender, in line with KCSIE 2026 and our legal duties under safeguarding legislation and equality and human rights law. We recognise that sometimes young children go through a period of questioning their gender but for the majority this will not continue into adulthood; that these children may have potential vulnerabilities (e.g. complex mental health and psychosocial needs, difficulties in relationships with family and peers); that we have distinct but interacting obligations under safeguarding legislation and equality and human rights law; and that any assessment of discrimination must be informed by our evaluation of the welfare and best interests of the child and other children.

Our approach

We create a supportive environment by taking time to understand the thoughts and feelings of children questioning their gender, being appropriately professionally curious, being aware of potential vulnerabilities, taking a strong, proactive stand against all forms of bullying (including misogyny and misandry), adopting policies that maintain flexibility and avoid rigid rules based on gender stereotypes, and creating a culture where children feel safe to speak out. We actively involve parents/carers where a child questioning their gender asks for support, unless doing so would constitute a greater risk to the child; we work in partnership with parents/carers to determine the best approach; we only proceed without parental involvement in rare circumstances where it would place the child at greater risk, and any such decision is made by the DSL in consultation with the headteacher and National Head of Safeguarding and clearly documented with rationale. We encourage families to seek clinical help and advice as early as possible, include any available clinical advice in decision-making, and recognise that only appropriately trained professionals should make diagnoses or clinical recommendations.

Social transition

We take a very careful approach to accommodating social transition, which may include using a different name or pronouns, changes to uniform or appearance, use of different facilities (toilets, changing rooms), and participation in activities or sports designated for a different sex. Staff will not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/carers have been involved (except in rare circumstances where this would constitute a greater risk). Where a child or parent/carer raises a request for support with social transition, we consider whether pupils would be best supported by a policy on social transition and document our decision-making. We conduct a holistic assessment considering the child's individual circumstances, age and developmental stage, potential vulnerabilities (mental health needs, autism, ADHD), the impact on the child and other children, the views of parents/carers, available clinical advice, the risk of bullying, and our obligations under safeguarding, equality and human rights law. For primary-aged children we exercise particular caution, recognise that support for full social transition should be agreed very rarely, and consider the child's developmental

stage and the fact that gender questioning may not continue into adulthood. Decisions are made in the best interests of the child concerned, balancing the child's wishes with our safeguarding duties, considering the impact on other children, ensuring a non-discriminatory approach, and documenting all discussions, decisions and rationale, kept securely and reviewed regularly.

Facilities and activities

Toilets, changing rooms and showers: we must not allow children into facilities designated for the opposite biological sex, including where responding to a request to support social transition. If a pupil questioning their gender does not want to use the facilities designated for their biological sex, we consider providing alternative facilities that do not compromise single-sex provision and do not compromise the safety, comfort, privacy or dignity of the child or any other children – for example individual, lockable facilities opening directly onto public areas, staff facilities (where appropriate and with safeguards), or designated times. Where we provide mixed-sex toilets in addition to single-sex toilets, we assess safeguarding risks, ensure mixed-sex toilets are individual lockable rooms, and ensure they open directly onto public areas. We keep a record of these situations, communicate records appropriately, and review arrangements regularly.

Boarding, residential and sport: for any boarding or residential provision, we must not allow children into accommodation designated for the opposite biological sex; alternative arrangements are considered case by case, with safeguarding as the primary consideration. Schools can separate children according to biological sex when playing certain competitive sports without discriminating unlawfully; some sports may need to be played in single-sex groups from a certain age to ensure safety, with no exceptions where this is the case. Where there are no safety concerns and a child makes a request relating to how they participate in sport, we consider the request in light of this appendix, the child's age and developmental stage, the nature of the sport and safety implications, and the impact on the child and others, working with parents/carers.

Recording, names and pronouns

We must record a child's biological sex accurately wherever it is recorded (admissions records, MIS, medical records, safeguarding records and any other records), ensure all records accurately reflect biological sex, update systems and processes to ensure compliance, and train staff on the importance of accurate recording. Information about a child questioning their gender is handled sensitively and confidentially and shared only on a need-to-know basis, considering the child's wishes (where appropriate), the views of parents/carers, safeguarding requirements, our legal duties, and the need to protect the child and other children. Staff will not adopt any changes to names or pronouns unless a decision has been made by the school and parents/carers have been involved (except in rare circumstances). If a decision is made to use a different name or pronouns, this is documented clearly, all relevant staff are informed on a need-to-know basis, the approach is

reviewed regularly, and official records continue to reflect the child's legal name and biological sex. Staff may respond to a child's request to be called by a different name in informal contexts (e.g. a nickname), but this is different from formally adopting a change as part of social transition and should be discussed with the DSL.

Uniform, stealth, detransition and review

Our uniform policy is inclusive and avoids rigid rules based on gender stereotypes; if a child questioning their gender requests changes to uniform, we consider the request in consultation with parents/carers, our uniform policy and whether it allows flexibility, and the impact on the child and other children, documenting and reviewing any decision. "Living in stealth" refers to a child already living as a different gender in a way not known to the school; if we become aware, we handle the situation sensitively, involve parents/carers (unless this would place the child at greater risk), follow this appendix, consider the child's individual circumstances, and ensure accurate recording of biological sex and compliance with facilities requirements. Detransition refers to a child who has socially transitioned deciding to revert to living as their biological sex; we provide appropriate support, work with parents/carers, involve any clinical professionals, update records and arrangements, continue to protect the child from bullying, and handle the situation sensitively and confidentially. All decisions relating to social transition are reviewed regularly – at least termly, when circumstances change, when the child moves to a new key stage, when requested by parents/carers or professionals, and when concerns arise – considering whether the approach remains in the child's best interests, whether circumstances have changed, the views of the child, parents/carers and professionals, the impact on the child and other children, and whether any adjustments are needed.

Appendix H: Restrictive physical interventions and absconding

This appendix provides detailed safeguarding procedures for two specialist areas in our SEND settings: Restrictive Physical Interventions (RPI) and absconding. Both are safeguarding events that require clear procedures, careful recording and DSL oversight. Read alongside Sections 9.7 and 9.8, the Physical Intervention and Seclusion Policy, the Behaviour and Anti-Bullying Policy and the Staff Code of Conduct.

Part 1: Restrictive Physical Interventions (RPI)

1.1 When RPI becomes a safeguarding concern

While RPI is sometimes necessary to keep students safe, it becomes a safeguarding concern – which staff must report to the DSL immediately – when any injury occurs (however minor); a student reports pain, distress or fear during or after an RPI; an RPI lasts longer than necessary for safety; prohibited practices are used or suspected; a student is secluded for longer than necessary; a pattern of frequent RPIs for the same student emerges; or there is disproportionate use of RPI with students with particular protected characteristics.

1.2 The four-part decision framework

Before any physical intervention, staff must ask:

(1) Is it NECESSARY? Is there an immediate risk of harm; have all de-escalation strategies been attempted; is there no other safe option; would not intervening result in greater harm?

(2) Is it PROPORTIONATE? Is the force the minimum needed; does the intervention match the level of risk; is it the least restrictive option; can it be reduced as risk reduces?

(3) Have I considered the student's WELFARE? Am I aware of medical conditions, disabilities and trauma history; the emotional and psychological impact; the student's dignity; and any specific vulnerabilities (e.g. breathing difficulties, joint problems)?

(4) Is my response CONSISTENT with the student's SUPPORT PLANS? What do the Individual Behaviour Support Plan (IBSP) and risk assessment say; are there de-escalation strategies to try first; are there interventions that must NOT be used with this student? If the answer to any of these is "no" or "I don't know", do not proceed – seek support from a colleague or the DSL.

1.3 Prohibited practices

The following are NEVER permitted: using force as punishment or to force compliance with instructions; restricting airway, breathing or circulation in any way; applying pressure to neck, abdomen, chest or joints; covering the mouth or nose; deliberately keeping a student on the ground longer than necessary for safety; holding a student face-down (prone restraint) except in exceptional circumstances for the shortest possible time; applying pain to force compliance (e.g. pressure points, bending fingers); and pulling hair, twisting limbs or using any technique designed to cause pain. Prohibited environmental practices are: locking a student in a room alone (seclusion must be supervised); using seclusion as punishment or to force compliance; denying access to toilet, water or medication; and using

seclusion for longer than necessary for immediate safety. If you witness or suspect prohibited practices, you **MUST** report to the DSL immediately as an allegation against staff.

1.4 Seclusion

Seclusion is the most restrictive intervention and carries the highest safeguarding risk. It is only permitted when there is immediate risk of serious harm to the student or others, all other de-escalation strategies have been exhausted, the student cannot be kept safe in any other way, and it is for the shortest possible time. During seclusion the student **MUST** be continuously supervised (visually or through an observation panel), a member of staff **MUST** remain within hearing distance, the door must **NOT** be locked (unless the room is designed for this purpose and risk assessment permits), the student must have access to water and toilet facilities, time in seclusion is recorded in minutes (not rounded), and the student is offered the opportunity to leave as soon as they are regulated. Seclusion should typically last minutes, not hours; any seclusion lasting more than 30 minutes requires DSL notification, and more than one hour requires immediate DSL review and parent/carer notification. Afterwards the student receives an immediate welfare check, a post-incident debrief takes place when regulated, and the DSL and parents/carers are informed the same day.

1.5 Recording, communication and debrief

All significant uses of force, seclusion or non-physical restraint are recorded on CPOMS the same day. The record must cover: before the incident (what was happening, what de-escalation was attempted, the immediate trigger); during the incident (exact start time, type of intervention – be specific, e.g. “two-person standing hold”, “guided to safe space”, “seclusion in sensory room” – who was involved, where, how long in minutes, any words spoken, any injuries or distress); and after the incident (exact end time, how the student was afterwards, any injuries to student or staff, medical attention, who was informed, and debrief outcomes). The staff member completes the record before the end of the shift, factually and objectively, using the student’s words where possible and noting witnesses; the DSL reviews all RPI records within 24 hours.

Parents/carers must be informed the same day (where practicable) of any significant use of force, seclusion or non-physical restraint, covering what happened (factual), why the intervention was necessary, the type used, how long it lasted, any injuries, how their child is now, what support is being put in place, and an opportunity to ask questions – by phone call (preferred) followed by a written record on CPOMS, written communication sent home the same day if a call is not possible, or a face-to-face conversation at pick-up where appropriate. If parents/carers raise concerns, staff listen without being defensive, record accurately, inform the DSL immediately, follow up in writing, and offer a meeting. All staff involved participate in a post-incident debrief: with the student when regulated (what happened from their perspective, how they feel now, what would have helped, what to do differently, reassurance they are safe and cared for) and with staff (what worked, what

could have been done differently, warning signs missed, whether to update the IBSP or risk assessment, staff wellbeing, and team learning). Debrief outcomes are recorded on CPOMS.

1.6 DSL monitoring and when to refer

The DSL monitors RPI data to identify individual student patterns (frequent RPIs, whether increasing/decreasing, whether interventions are becoming more or less restrictive, whether IBSPs are effective), whole-school patterns (overall frequency, types most commonly used, times and locations, whether particular staff are involved more frequently), disproportionality (whether students with particular SEND needs, ethnic backgrounds, or boys or girls are subject to more RPIs, and any patterns related to protected characteristics), and safeguarding concerns (injuries, prohibited practices, complaints, allegations). The DSL reports RPI data to governors termly (total incidents, students involved, patterns or concerns, actions taken) and ensures any allegation of inappropriate use of force is handled under Section 17. The DSL considers a safeguarding referral to children's social care if a student is injured and the injury is unexplained or concerning, a student discloses they felt harmed or unsafe, there is evidence of prohibited practices, a student is subject to frequent RPIs indicating unmet needs, a pattern suggests risk of harm, or parents/carers raise serious concerns; the DSL always consults the National Head of Safeguarding before making an RPI-related referral.

Part 2: Absconding and missing from education

2.1 Risk assessment and prevention

Every student has an absconding risk assessment completed on admission, reviewed termly, and reviewed after any absconding incident or significant change in circumstances. It categorises students as LOW RISK (no history, good awareness of danger, able to communicate needs, no contextual concerns – response: standard supervision, building security); MEDIUM RISK (occasional history, some awareness of danger, may have communication needs, some contextual concerns – response: enhanced supervision, individualised safety plan, identified safe spaces); or HIGH RISK (frequent history, limited awareness of danger, significant communication needs, serious contextual concerns such as CSE/CCE/county lines, Child in Need/Child Protection/Looked-After status, history of going missing from home, known mental health risk such as self-harm or suicidal ideation – response: intensive supervision, 2:1 support if needed, immediate 999 call if absconds, police and social care informed immediately).

2.2 Dynamic risk assessment during an incident

Throughout every absconding incident, the DSL and deputy DSL conduct a continuous dynamic risk assessment – continuously evaluating risk as the situation develops, adjusting the response based on new information, making real-time escalation decisions, and balancing competing risks (e.g. risk of pursuit vs. risk of losing sight of the student). They continuously consider immediate risk factors (where the student is now – busy road, near water, isolated area, known danger spot; weather; time of day; who the student might encounter – known exploiters, gang members, strangers; the student's mental state; how

long they have been missing) and student-specific factors (the student's risk assessment; medical needs; communication needs; sensory needs; trauma history; contextual safeguarding concerns). They gather information from staff (sightings, direction of travel, demeanour), parents/carers, CCTV and police.

Decision points: Call 999 immediately if the student is high-risk, near immediate danger (busy road, water, railway, cliff), with concerning adults, missing more than 30 minutes and cannot be located, in weather posing immediate risk, has recently disclosed suicidal ideation, has significant medical needs and may lack medication, or it is getting dark and the student is not located. Call 101 if the student is low/medium risk, missing less than 30 minutes, no immediate danger, weather reasonable, and recently sighted and safe. Continue following if the student is in sight, staff are safe, the student is not entering immediate danger, and following is not escalating the situation; return to school if the student is out of sight, staff safety is compromised, the student is entering a dangerous area staff cannot safely enter, following is escalating distress or flight, or 15–20 minutes have elapsed. Escalate to social care immediately if the student is LAC, CIN or CP and missing more than 15 minutes, discloses exploitation or harm, is found in a concerning location or with concerning adults, or returns with unexplained injuries, gifts or money. Consider informing the Virtual School (if LAC), EHCP team (if significant SEND), mental health crisis team (if mental health risk), and the local authority safeguarding team (if serious concerns). The DSL/deputy records the dynamic risk assessment on CPOMS, including what information was considered, what decisions were made and when, the rationale for each decision, who was consulted, and what actions were taken.

2.3 Immediate response protocol

Step 1 – Alert (0–1 minute): the adult who notices alerts the Headteacher/DSL immediately, uses radio/phone to alert all staff, states student name, last known location, time noticed missing and what they were wearing, and the DSL/deputy begins the dynamic risk assessment.

Step 2 – Search (1–5 minutes): two adults search the building and grounds systematically, one adult coordinates from the office and monitors CCTV, checking toilets, quiet spaces, outdoor areas and known hiding spots; if found, ensure the student is safe, inform the Headteacher/DSL and record on CPOMS.

Step 3 – Risk review (5 minutes): the Headteacher reviews the student's risk card and absconding risk assessment; the DSL/deputy conducts the initial dynamic risk assessment; HIGH RISK = call 999 immediately; MEDIUM/LOW RISK = proceed to Step 4 while continuing dynamic risk assessment.

Step 4 – Inform parents/carers (5–10 minutes): call parents/carers immediately, inform them the student has left site and what we are doing, ask if they have any information, log the conversation on CPOMS with exact time and content, and ask them to call immediately if the student makes contact.

Step 5 – Follow if safe (10–30 minutes): two members of staff follow if they can see the student, it is safe, they can maintain a safe distance, and the DSL/deputy has assessed that following will not escalate. Staff keep the student in sight, maintain distance (do not approach closely), offer the opportunity to return (“We’re here when you’re ready to come back”), do NOT chase, grab, block or detain, report back regularly, and call for police support if the student enters a dangerous situation. Follow for a maximum of 15–20 minutes, then return to school and update the Headteacher.

Step 6 – Police, non-urgent (if not located): the DSL/deputy decides to call police based on the dynamic risk assessment; if the student cannot be located and risk is not immediate, call 101, report as child missing from education, provide student details, description, last known location, direction of travel, risk factors and parent/carer contacts, share the dynamic risk assessment, and log the police reference number on CPOMS.

Step 7 – Stand down (when located): inform police through the same channel (101 or 999) that the student is safe, provide the police reference number, thank them, and record the final dynamic risk assessment and decisions.

Step 8 – Escalate (if not returned by end of school day): the DSL/deputy reviews the dynamic risk assessment and determines escalation, updating parents/carers and police, informing social care if the student is LAC/CIN/CP, informing the Local Authority and EHCP team, and considering whether to activate local missing child procedures.

2.4 Dynamic risk assessment template

The DSL/deputy uses this framework during an incident and completes it on CPOMS afterwards.

Time	Information received	Risk	Decision	Rationale	Action taken
10:15	Student absconded, last seen heading towards main road	High	Call 999	History of running into traffic, high-risk on risk card	Police called, two staff following at distance
10:20	Student crossed road safely, heading towards park	High	Continue following, police en route	Student safe for now but park is known CSE location	Staff continue following, police updated
10:30	Student sitting on bench in park, appears calm	Medium	Police to approach, staff to stay back	Student calm; staff presence may escalate	Police approach, staff observe from distance
10:35	Student agrees to return with police	Low	Return to school, parents informed	Student is safe, returning willingly	Student returns in police car,

Time	Information received	Risk	Decision	Rationale	Action taken
					welfare check on arrival

2.5 Why we do not chase

Chasing a student who has absconded can increase physical danger (pushing them into traffic, causing them to run faster without looking, leading them into unfamiliar or dangerous areas such as water or railway lines, escalating panic and flight response), increase safeguarding risk (pushing them towards exploiters or harmful individuals, causing them to hide in dangerous places, damaging trust in staff, and increasing the likelihood of future absconding), and create legal risk (physically preventing a student from leaving a public space may constitute false imprisonment, using force to detain outside school grounds may breach the Human Rights Act, and it may lead to allegations against staff). Our approach is to keep eyes on the student where safe, maintain a supportive presence, alert police if needed, allow the student to make the choice to return, and continuously assess whether this approach remains safe and appropriate.

2.6 Return and recovery

When the student returns, staff follow a trauma-informed cycle. Phase 1 – Safety (0–15 minutes): welcome the student back warmly (no anger, no consequences), carry out an immediate welfare check (hurt, cold/hot, hungry/thirsty, need the toilet or nurse), provide physical comfort (blanket, drink, snack) if needed, and take the student to a quiet, safe space with their key adult. Phase 2 – Regulation (15–60 minutes): the student is in their key adult's care with no consequences, questions or processing; focus on co-regulation (calm presence, sensory support if helpful, reassurance – “You're safe now, we're glad you're back”) and wait for the student to reach a regulated state. Phase 3 – Restorative (when regulated): gently explore what happened from their perspective, what they were feeling, what they needed and what would help next time, using the student's communication method, without interrogating or blaming, focusing on understanding and problem-solving. Phase 4 – Safeguarding (DSL-led): the DSL leads enquiries (where did you go, did you see or speak to anyone, did anything happen, how did you get back); if the student discloses safeguarding concerns, follow Section 8, consider referral to police/social care, and record on CPOMS; if the student does not want to talk, do not force it but record this. Phase 5 – Plan review (within 24 hours): the DSL convenes a meeting with the key adult, SENCO, parents/carers (if appropriate) and other relevant staff to review what triggered the absconding, what changes are needed in the IBSP and risk assessment, what additional support is needed, what environmental changes are needed, and whether to involve other agencies.

2.7 Repeat absconders

If a student absconds more than once in a term, the DSL immediately reviews all absconding incidents to identify patterns (times of day, triggers, locations, what the student was trying to escape or access), enhances the risk assessment, increases the supervision level, and provides 1:1 or 2:1 support if needed. Within one week, the DSL convenes a multi-agency meeting (parents/carers, social worker if applicable, educational psychologist, mental health services, police if contextual concerns, Virtual School if LAC) and conducts a comprehensive IBSP review (is the curriculum meeting the student's needs, is the student in the right pathway, are there unmet therapeutic needs, are there safeguarding concerns we are missing, what is the student trying to tell us). Ongoing responses include weekly review of absconding risk and support plan, therapeutic support (e.g. play therapy, counselling, trauma-informed intervention), curriculum or pathway adjustment, family support, and consideration of an EHC plan review. We NEVER apply sanctions or consequences for absconding, exclusion or suspension for absconding, removal of privileges or activities, or any response that increases distress or pushes the student further from school.

2.8 Recording, monitoring and multi-agency working

All absconding incidents are recorded on CPOMS and Arbor the same day, covering before (what was happening, the trigger if known, when and where the student was last seen, what they were wearing), during (when noticed missing, who noticed, actions taken and times, who was involved, sightings, contact from the student or others, dynamic risk assessment decisions and rationale), after (return time and method, physical and emotional state, injuries or concerns, safeguarding disclosures, who was informed, support provided), and follow-up (debrief outcomes, risk assessment and IBSP review, changes to support or supervision). Police reference numbers are recorded where police were involved. The DSL monitors absconding data for individual and whole-school patterns, disproportionality and safeguarding concerns, and reports to governors termly (total incidents, students involved, patterns, actions, multi-agency involvement).

The DSL considers a safeguarding referral to children's social care if a student is found in a dangerous or concerning location, discloses contact with concerning adults while absent, returns with unexplained injuries, gifts or money, discloses exploitation (CSE, CCE, county lines), is missing for an extended period, repeatedly absconds despite intensive support, or where parents/carers are unable or unwilling to support the student's safety or there are concerns about safety at home – always consulting the National Head of Safeguarding first. For students who repeatedly abscond or are at high risk, the DSL works with police (sharing vulnerabilities, agreeing a joint response plan, requesting support, participating in missing child meetings), children's social care (sharing patterns, requesting assessment or support, participating in Child in Need or Child Protection meetings, contributing to safety planning), health services (requesting mental health assessment, sharing information about self-harm or suicidal ideation, accessing crisis support), and parents/carers (keeping them fully informed, agreeing joint strategies for home and school, providing support and signposting). Staff should refer to the staff handbook for further guidance.

Appendix I: Recording safeguarding concerns

This appendix provides guidance for staff on how to record safeguarding concerns and what should be recorded. All safeguarding concerns must be recorded on CPOMS (Child Protection Online Management System).

What should be recorded

Safeguarding concerns: any disclosure of abuse or harm; any concern that a child is being abused, neglected or harmed; indicators of abuse (physical, emotional, sexual, neglect); child-on-child abuse (including sexual violence, sexual harassment, bullying); exploitation concerns (CSE, CCE, county lines); radicalisation or extremism concerns; FGM, forced marriage or honour-based abuse concerns; online safety concerns; and concerns about a child carrying or using a weapon.

Welfare concerns: significant changes in behaviour, mood or presentation; significant changes in attendance or punctuality; mental health concerns (including self-harm, suicidal thoughts); concerns about physical health or hygiene; concerns about a child being hungry, tired or inappropriately dressed; concerns about home circumstances; and concerns about a child being a young carer.

Incidents and RPIs: any physical injury; physical or verbal aggression; discriminatory language or behaviour; sexual harassment or inappropriate sexual behaviour; making or sharing of nudes or semi-nudes; incidents involving weapons; absconding incidents; and any use of physical restraint or seclusion.

When to record

If in doubt, record it. It is better to record a concern that turns out to be nothing than to not record one that turns out to be serious. Examples that DO need recording include a child disclosing abuse, unexplained bruising, significant behaviour changes, concerning disclosures about home life, frequent lateness or absence, a child appearing hungry, tired or unkempt, concerning comments or behaviour, and a "gut feeling" that something isn't right. Examples that do NOT need recording on CPOMS (record on Arbor instead) include a forgotten PE kit, late homework, minor disagreements resolved quickly, and general classroom behaviour without safeguarding concerns. Record immediately after a disclosure, the same day for other concerns, and always before the end of your shift. Do not wait for "more information", do not wait to speak to the DSL first (record it, then speak to them), and do not wait until you are "sure" it is a concern.

How to record on CPOMS

Your CPOMS entry should include the date and time (be specific), your name (the staff member reporting), the student name or initials, the location (where it happened), exact words in quotation marks, a factual description of what you saw, the immediate actions you

took, and the names of any witnesses. Be factual – stick to facts, do not include opinions, judgments or speculation. Be detailed – include date, time and location, the child's exact words in quotation marks, what you saw, heard or were told, and names of witnesses. Be clear – use simple language, avoid jargon or abbreviations, and write chronologically. Be complete – include what happened before, during and after, what you said and did, and any immediate actions taken.

What happens next and confidentiality

The DSL will review your entry within 24 hours (or immediately if urgent), decide what action to take, contact you if more information is needed, update CPOMS with actions taken, and monitor patterns and trends. You may be asked to provide more information, attend a meeting, monitor the child, or implement support strategies. CPOMS entries are confidential; you must NOT discuss entries with colleagues (unless they need to know), with parents/carers (unless instructed by the DSL), or with other pupils, and you must not share screenshots or copies. If you disagree with the DSL's decision, discuss your concerns with the DSL; if still concerned, contact the National Head of Safeguarding; and if you believe a child is at immediate risk, you can make a referral to children's social care yourself (see the Whistleblowing Policy). Recording on CPOMS is one of the most important things you can do to keep children safe – your records might be the key to protecting a child from harm. For full guidance see Section 8 (Recognising and Responding to Abuse) and Section 14 (Record Keeping).

Appendix J: Sixth Form Safeguarding Arrangements

- This appendix sits within the Progress Arc sixth form provisions.
- It sits within the wider policy rather than replacing it.
- It recognises the different safeguarding profiles of students aged 16-19.
- It must be used where sixth form students share a site, activity or provision with younger students.

Progress Arc recognises that sixth form students may have different developmental, social, educational and safeguarding needs to younger pupils. Safeguarding arrangements will support increasing independence while maintaining appropriate protection, supervision and professional curiosity.

Staff must remember that many sixth form students are still children in law. Where a student is under 18, child safeguarding procedures apply. Where a student is 18 or over, staff will still consider vulnerability, SEND, mental capacity, exploitation, adult safeguarding, consent, welfare and preparation for adulthood.

Relationships, consent and age-appropriate discussion

Sixth form students may appropriately engage in more mature learning and discussion relating to relationships, sexual health, consent, online relationships, employment, independent travel and adulthood. Staff must ensure that content is planned, supervised and suitable for the age, maturity, SEND profile and understanding of the students involved. Where sixth form students share facilities, activities or learning opportunities with younger pupils, discussions, language, social interaction and curriculum content will be risk assessed. What is appropriate for a 17-year-old may not be appropriate for a 13-year-old. Staff will plan mixed-age activity carefully and intervene where boundaries, language or behaviour become unsuitable.

Mixed-age safeguarding

Shared spaces will be supervised according to risk, age, vulnerability and known safeguarding information. Relationships or concerning interactions between older and younger pupils will be assessed for age gap, power imbalance, coercion, consent, vulnerability and online contact.

Staff will be alert to sexualised language, grooming, pressure, gifts, secrecy, social media contact or attempts to isolate younger pupils. Arrangements for toilets, changing areas, social times, transport and enrichment activities will consider age and vulnerability. Any concern involving an older student and a younger pupil will be recorded and reviewed by the DSL.

Independence, travel and community safety

Sixth form provision may involve increased independence, community access, independent travel, work experience or college-style expectations. Independence will be supported through risk assessment, preparation, clear boundaries and review. Staff will consider exploitation, transport risks, online contact, local area risks, missing episodes, substance misuse, peer influence and personal safety.

Employment, work experience and preparation for adulthood

Where students access employment, volunteering, work experience or community-based learning, safeguarding checks and risk assessments will be completed. Students will be taught how to report concerns in the workplace, including unsafe adults, harassment, discrimination, exploitation, bullying, inappropriate messages, pressure to keep secrets or unsafe working conditions.

Online safety for older students

Older students may have wider access to personal devices, social media, online dating, gaming, financial services and adult content. The curriculum and pastoral support will address consent, image sharing, sextortion, scams, digital footprints, AI-generated imagery, online misogyny, pornography, harmful content and reporting routes.

Mental health and transition

Arc staff will consider the mental health impact of transition to adulthood, exams, employment, relationships, family expectations, identity, independence, loneliness and online pressures. Concerns about self-harm, suicidal ideation, exploitation or significant emotional distress must be managed through safeguarding procedures.