Name of Policy / Strategy:	Safeguarding Policy and Operating Practices		
Written by:	Justin Speirs, Director of Curriculum & Quality		
Approved by:	Board of Directors	**Date:**	11/08/2026
Implementation Date:	September 2026		
Review date*:	September 2027		
Associated policies, procedures & Strategies:	• Equality & Diversity Policy • Safer Recruitment Policy • Acceptable Use Policy • Health & Safety Policy • Whistleblowing Policy		
Amendments (include date)	June 2026 • Allegations management process flowchart added • restructure to policy to include clearer sections and appendixes July 2025 • Addition of low-level concerns to policy • Addition of specific reference to online safety • Addition of requirement for medical forms for all under 18s and learners up to 25 with an EHCP • Update of job titles May 2025 • Updated DSL September 2024 • Updated DSL and Safeguarding Officers June 2024 • Revised policy statement • Updated links		

Policy Statement

SS&L is fully committed to providing a safe learning and working environment where all learners and staff are free from harm and abuse. A culture of vigilance is actively promoted across the

organisation, including the Board of Directors, through appropriate training and clearly defined roles, responsibilities, and procedures.

SS&L recognises the Prevent Duty as an integral part of safeguarding. In line with the *Counter-Terrorism and Security Act 2015*, SS&L has due regard to the need to prevent individuals from being drawn into terrorism.

The organisation is committed to:

- Safeguarding and promoting the welfare of all learners and staff
- Protecting individuals from radicalisation and extremism
- Working effectively with multi-agency partners
- Ensuring all staff remain vigilant and responsive to safeguarding concerns

All staff, learners, and partners are expected to uphold Human Rights and British Values, including:

- Democracy
- Rule of law
- Individual liberty
- Mutual respect and tolerance

Background and Legislative Framework

This policy is informed by key legislation and statutory guidance including, but not limited to:

- Children Act 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education (KCSIE) 2026
- Counter-Terrorism and Security Act 2015 (Prevent Duty)

SS&L recognises its role within the wider safeguarding system and contributes to local safeguarding arrangements, including engagement with the Somerset Prevent Board.

Scope

This policy applies to:

- All SS&L staff, volunteers, and individuals working on behalf of SS&L
- All learners (children, young people, and adults)
- All delivery locations (on-site and off-site)
- Work placements, apprenticeships, and subcontracted provision

Definitions

For the purposes of this policy:

- A child is anyone who has not yet reached their 18th birthday.

- safeguarding is the responsibility to protect children, young people and vulnerable adults from harm, abuse, neglect and exploitation, while promoting their welfare and ensuring they can learn in a safe and supportive environment.
- Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- A vulnerable adult is a person aged 18 or over who may be unable to protect themselves from abuse, neglect or exploitation because of care and support needs or other vulnerabilities.
- DSL means Designated Safeguarding Lead, they are an appropriate senior member of staff, from the management team.
- Safeguarding concern means any information, observation, disclosure or pattern that may indicate abuse, neglect, exploitation, risk of harm or unmet welfare need.

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

Justin Speirs, Director of Curriculum & Quality

Responsible for:

- Managing safeguarding referrals and liaising with external agencies
- Providing advice and guidance to staff
- Maintaining safeguarding records
- Overseeing staff training and safeguarding inductions
- Monitoring and reviewing safeguarding policy and Prevent risk assessment

Deputy DSLs / Safeguarding Officers

Karen Savill, Delivery Manager (Work-based Learning)
Tracey Mortimore, Delivery Manager (Adult Skills)
Lisa-Marie Davies, Delivery Manager (16-19)

Provide support and deputise for the DSL where required.

Operational Safeguarding Lead

Tracey Smith, Finance & Resource Manager

Responsible for:

- Safer recruitment
- Health & safety
- IT usage and online safety
- Supporting Prevent risk assessment

Board of Directors

- Approve and scrutinise safeguarding policy
- Ensure leadership and oversight is effective

Senior Leaders

- Ensure safeguarding is adequately resourced
- Manage allegations against staff

Line Managers

- Implement safeguarding procedures
- Maintain safeguarding as a standing and meaningful agenda item at all team meetings

All Staff

Must comply with the Safeguarding Policy and training requirements

- Promote a safe environment
- Report concerns immediately

Training and Development

Mandatory Training for all staff

SS&L is committed to ensuring that all staff have the knowledge, skills and confidence to recognise, respond to and report safeguarding concerns effectively. To support this, safeguarding and Prevent training is mandatory for all staff.

Induction: All staff are required to complete safeguarding and Prevent training as part of their induction, ensuring they understand their safeguarding responsibilities, how to recognise potential concerns and the procedures for reporting and escalating them.

Refresher Training: All staff must refresh their safeguarding and Prevent training at least every three years. For staff with teaching responsibilities, this training must be refreshed at least every two years.

Annual Safeguarding Updates: All staff are required to attend annual face-to-face safeguarding update training. This will reinforce key safeguarding responsibilities, share learning from safeguarding practice and communicate relevant changes to legislation, statutory guidance and organisational procedures, including updates to *Keeping Children Safe in Education (KCSIE)*.

Ongoing Awareness: Staff will also receive safeguarding updates throughout the year, where appropriate, to ensure they remain informed of emerging risks, changes to guidance and developments in safeguarding practice.

Completion of mandatory training will be recorded and monitored to ensure compliance with SS&L's safeguarding training requirements.

DSL Training

- Level 3 training every 2 years

Safer Recruitment Training

- Completed every 3 years by all recruiting managers

Discrimination and Prejudice-Based Harm

SS&L is committed to providing a safe, inclusive and respectful learning environment where everyone is treated with dignity and free from discrimination, harassment and prejudice-based harm.

Discrimination and prejudice-based harm can include bullying, harassment, intimidation, exclusion, verbal or physical abuse, or online abuse directed at an individual because of their actual or perceived characteristics, including race, religion or belief, disability, sex, sexual orientation, gender reassignment or other aspects of their identity.

Such behaviour can have a significant impact on a learner's safety, wellbeing, confidence and ability to participate in education.

All staff have a responsibility to recognise, challenge and report discriminatory behaviour and prejudice-based harm. Where concerns indicate that a learner is experiencing, or is at risk of, abuse or harm, these must be reported in accordance with SS&L's safeguarding procedures.

SS&L will take appropriate action to support those affected, address harmful behaviour and promote a culture of equality, inclusion and respect, in line with the Equality Act 2010 and our Equality, Diversity and Inclusion Policy.

Online Safety and AI, Filtering, Monitoring

SS&L views online safety as part of its safeguarding responsibilities. SS&L recognises that students may experience harm through content, contact, conduct and commerce, including online grooming, sexual harassment, cyberbullying, exploitation, radicalisation, self-harm content, coercive control, online fraud, harmful challenges, misinformation, disinformation, conspiracy theories, AI-generated content and deepfakes.

SS&L will maintain appropriate filtering and monitoring systems wherever possible and will review their effectiveness at least annually. Reviews will include the safeguarding team and IT and will consider student age and needs, known risks, incident data, system reports, curriculum use, AI-enabled risks and emerging technologies. This will be reported on in safeguarding updates provided to the Board.

Where online concerns are identified, they will be treated as safeguarding concerns and referred through the safeguarding reporting route. Evidence will be handled carefully and staff must seek DSL advice before viewing, forwarding, copying or storing any potentially illegal or harmful material.

Principles

- Safe and responsible digital use
- Awareness of risks (misinformation, bias, privacy)
- Protection of personal data
- Promotion of respectful online behaviour

Staff Responsibilities

- Guide learners in safe and ethical use
- Ensure approved tools are used appropriately
- Support critical evaluation of digital content

Children Who Are Questioning Their Gender

SS&L recognises that children and young people who are questioning their gender may require sensitive, individualised support to ensure their safety, wellbeing and inclusion.

In line with *Keeping Children Safe in Education (KCSIE) 2026*, staff must adopt a respectful, supportive and non-judgemental approach, recognising that every young person's circumstances and needs are different.

Where a young person requests support relating to social transition, SS&L will take a careful, case-by-case approach, considering the young person's best interests, individual needs, safeguarding risks and any relevant clinical advice. Parents and carers should be involved as a priority, unless there is a significant risk of harm associated with doing so. In such circumstances, the Designated Safeguarding Lead (DSL) must be consulted before any action is taken.

Staff must remain alert to potential vulnerabilities, including bullying, discrimination, emotional distress and barriers to seeking support. Questioning one's gender is not, in itself, a safeguarding concern.

Any safeguarding concerns must be reported in accordance with SS&L's safeguarding procedures. All young people must be treated with dignity and respect and supported to feel safe, valued and included in their learning environment.

Child-on-child abuse, sexual violence and harmful sexual behaviour

Abuse is abuse, regardless of who perpetrates it. SS&L will not minimise harmful behaviour as banter, relationship issues, experimentation or part of growing up.

Child-on-child abuse may include bullying, cyberbullying, prejudice-based abuse, sexual harassment, sexual violence, harmful sexual behaviour, abuse in intimate personal relationships, consensual and non-consensual sharing of self-generated intimate images, AI-generated intimate images or deepfakes, physical violence, initiation or hazing, coercion, exploitation and harmful online conduct.

Reports will be taken seriously. Victims will be supported and alleged perpetrators will be managed in a way that protects all students and preserves fairness and due process. Students are able to report these concerns to any member of staff.

Allegations Against Adults

An allegation is where an adult working with learners has:

- Harmed or may have harmed a child or adult at risk
- Committed or may have committed a criminal offence against a child or adult at risk
- Behaved in a way that indicates they may pose a risk of harm to children or adults at risk
- Behaved in a way that suggests they may be unsuitable to work with children or adults at risk

Process

- All allegations must be reported immediately to the Designated Safeguarding Lead (DSL)
- The DSL will seek advice from the appropriate external agencies

Referral Pathways

- The Local Authority Designated Officer (LADO) process applies to allegations involving individuals who work with children under the age of 18
- Allegations involving adults at risk will be managed through appropriate safeguarding procedures, including referral to adult social care and/or the police, where required

- In some cases, concerns may meet the threshold for both children's and adult safeguarding procedures, and parallel referrals may be necessary

Escalation

- If the allegation concerns the DSL, it must be reported directly to the CEO, who will follow the same process

Low-Level Concerns

SS&L promotes a culture of openness where concerns can be raised early. A low-level concern is any concern that an adult may have acted in a way that is inconsistent with the staff code of conduct or does not meet the threshold for LADO referral.

Examples may include:

- Being overly familiar or having favourites
- Inappropriate language or communication
- Breaches of professional boundaries
- Use of personal devices for images
- Behaviour that may appear inappropriate, even if unintentional

Process

- Report to DSL or line manager
- Information gathered and assessed
- Behaviour evaluated against thresholds
- Appropriate action taken:
    - management guidance
    - disciplinary action
    - escalation to LADO if required

Key Principle

Low-level concerns that indicate a pattern of behaviour, or increase in seriousness, may meet the threshold for formal allegations.

Recording

- All concerns are recorded in writing
- Stored securely in line with GDPR
- Reviewed to identify patterns

Employers and Subcontractors

Employers

SS&L will support employers to:

- Understand safeguarding responsibilities
- Promote Prevent Duty and British Values
- Provide safe working environments

Subcontractors

Must:

- Ensure staff training and DBS checks are carried out in line with SS&L's policies and procedures as a minimum
- Follow safeguarding requirements as set out in SS&L's policies and procedures as a minimum
- Participate in the monitoring and reviewing of safeguarding practices carried out by SS&L

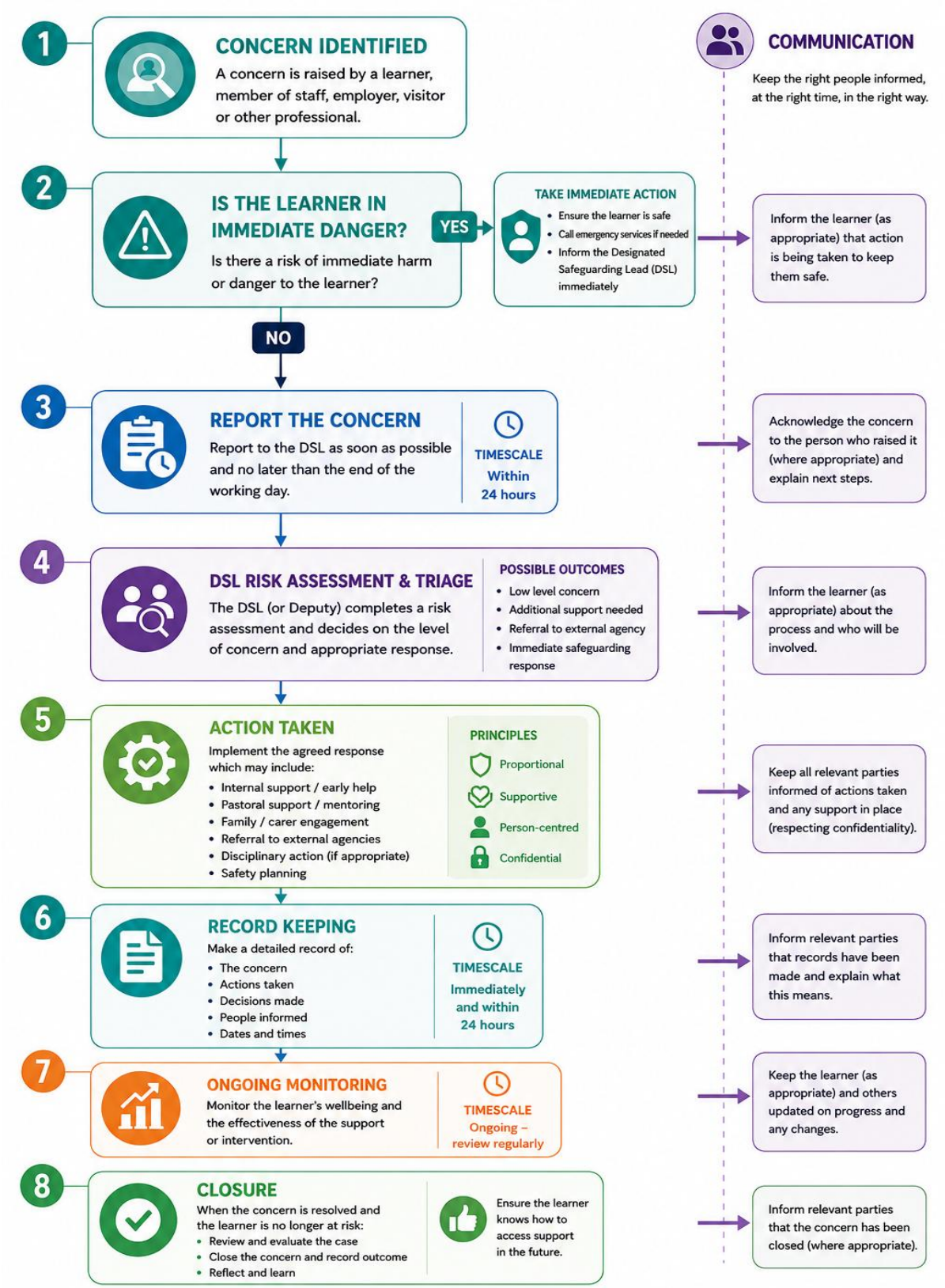
Reporting a Safeguarding Concern

All concerns must be reported immediately to the **DSL or Safeguarding Officers**.

- In emergencies, immediate risk of harm, call **999**
- Staff must not investigate concerns themselves
- Concerns must always be confirmed as received and followed through



Appendix A - Reporting Process Flowchart



Appendix B - Definitions and Indicators of Abuse (KCSIE)

This appendix provides a concise reference for staff. It does not replace KCSIE, safeguarding training or DSL advice. Staff must report any concern even where they are unsure whether a threshold is met.

Area	Definition/Indicator
Physical Abuse	May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricated or induced illness, or any action causing physical harm
Emotional Abuse	Persistent emotional maltreatment which may damage emotional development, including conveying worthlessness, silencing, bullying, humiliation, intimidation, isolation, exploitation or seeing/hearing domestic abuse
Sexual Abuse	Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This includes contact and non-contact abuse, online sexual abuse and image-based abuse
Neglect	Persistent failure to meet basic physical or psychological needs, likely to result in serious impairment of health or development. It may involve inadequate supervision, food, clothing, shelter, medical care or emotional support
Child Sexual Exploitation	A form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity
Child Criminal Exploitation	A form of abuse where a child is exploited into criminal activity. A child cannot consent to exploitation
Extra-familial Harm	Harm occurring outside the family home, including in peer groups, neighbourhoods, online environments, public spaces, workplaces, placements and residential settings
Harmful Sexual Behaviour	Sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful to self or others, or may be abusive
Online Harm	Risks arising from online content, contact, conduct or commerce, including grooming, exploitation, harassment, bullying, radicalisation, coercion, misinformation, AI-generated content and deepfakes
Low-level Concern	Any concern that an adult working with children may have acted in a way that is inconsistent with the staff code of conduct, including behaviour that may not meet the harm threshold but still requires recording and review.