SAFEGUARDING POLICY

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027

SAFE PEOPLE • POSITIVE PATHWAYS • COMPLIANT PRACTICE | Impact Alternative Learning - commissioned alternative provision.

1 PURPOSE AND SCOPE

- Safeguard every child and young person attending Impact, on site, off site, during transport provided by Impact and in online interactions. Child welfare overrides commercial or placement considerations.
- This policy applies to staff, agency workers, volunteers, tutors, contractors and leaders. Adults over 18 are also protected through relevant adult safeguarding routes; child-protection duties concern under-18s.

2 STATUS AND STATUTORY ALIGNMENT

- Impact currently operates alternative provision (AP); any proposed independent school must not be described as registered until DfE approval is confirmed.
- For AP, adopt the safeguarding controls in KCSIE 2026, Working Together 2026 and the DfE non-school AP national standards proportionately; meet binding duties relevant to the setting and commissioner agreements.

3 NAMED SAFEGUARDING LEADERSHIP

- Principal / DSL: Kate Willis. Deputy DSL: Kirsty Lampkin. Safeguarding governor: Jennifer Maunsell.
- Display current safeguarding names and contact methods at both sites and in the induction information. Deputising arrangements must provide an available trained safeguarding lead throughout provision.

4 SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

- All staff read KCSIE 2026 Part One in FULL (not merely the overview), confirm understanding and complete induction and refresher training appropriate to role.
- Any adult with a concern acts immediately, records facts and reports promptly to DSL / deputy. Staff can refer directly to children's social care where necessary; never assume another person has acted.

5 RECOGNISE NEEDS AND HARM

- Recognise abuse, neglect, exploitation, domestic abuse, criminal and sexual exploitation, child-on-child abuse, coercion, online harm, radicalisation and abuse in intimate relationships.
- Observe contextual risks, attendance changes, injuries, disclosures, unexplained absence, family circumstances and issues involving adults at the setting. Absence of a disclosure is not absence of risk.

6 RESPONDING TO A DISCLOSURE

- Listen calmly, reassure without promising secrecy, use the learner's own words and do not investigate or ask leading questions.
- Call 999 for immediate danger. Record date/time, exact words, observations, actions and who was told; pass securely to DSL without delay.

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7 ASSESSMENT, REFERRALS AND ESCALATION

- DSL assesses the concern and seeks support via relevant local safeguarding partnership, children's social care/MASH or police. Make referrals promptly when thresholds are met, including without parental consent when seeking consent would increase risk.
- Escalate disagreements or insufficient response through local professional challenge routes. Monitor and record outcomes, action owners and deadlines until risk is addressed.

8 ALLEGATIONS ABOUT ADULTS AND LOW-LEVEL CONCERNS

- Report any adult-conduct concern without delay to the designated case manager. Concerns about the Principal/proprietor must be routed to the safeguarding governor/chair and the LADO as appropriate, not investigated by the person implicated.
- Apply KCSIE 2026 Part Four thresholds for harm allegations and separate low-level concerns routes. Preserve records and confidentiality; do not promise that concerns will be kept secret.

9 CHILD-ON-CHILD ABUSE AND SEXUAL HARM

- Take all reported sexual harassment, violence, bullying, harmful sexual behaviour and online abuse seriously; protect the affected child and those alleged to have harmed others.
- Record risk assessments and safety/support plans; involve police and children's social care when indicated. Do not use reconciliation or mediation as a substitute for safeguarding.

10 SEND AND ADDITIONAL VULNERABILITY

- Account for disabilities, communication differences, trauma, EHCP provision, looked-after status and barriers to reporting. Make support accessible, predictable and child-centred.
- Do not attribute signs of abuse automatically to disability, behaviour or mental health. Record reasonable adjustments, risk plans, access to a trusted adult and engagement with families/professionals.

11 ONLINE SAFETY AND HARMFUL TECHNOLOGY

- Maintain appropriate filtering/monitoring where Impact manages networks or devices; assign responsibility for checks, alerts and escalation. Address mobile-device, image-sharing, AI, grooming and online exploitation risks.
- Record technology incidents and lessons learned; do not use personal accounts to contact learners or store sensitive images on personal devices.

12 SAFER RECRUITMENT AND DEPLOYMENT

- No adult starts unsupervised child-facing duties until required suitability checks, identity, references, role-appropriate DBS / barred-list checks, and safeguarding induction are complete.
- Maintain current single central record / workforce checks schedule, risk assessments for any exceptions permitted by law and supervision arrangements.

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13 ATTENDANCE, MISSING LEARNERS AND OFF-SITE DELIVERY

- Complete registers for every planned session. Contact families and commissioners promptly about non-arrival; follow individual plans for missing-from-education concerns.
- Verify handover for each external venue, transport journey and vocational activity; clarify supervision, emergencies and safeguarding information sharing in writing.

14 RECORD KEEPING AND CONFIDENTIALITY

- Keep accurate, dated, contemporaneous safeguarding records in secure restricted-access systems, separate from ordinary learning records. Record concern, decision, rationale, referral, outcome, follow-up and closure.
- Share necessary, proportionate information under applicable law and current DfE 2026 safeguarding information-sharing guidance; record the legal basis, recipients and reason.

15 INFORMATION-SHARING DUTY: SCOPE CHECK

- The Children Act 2004 section 16LA duty began 30 September 2026 for specified relevant persons; its application to Impact as a non-statutory AP provider depends on legal status and functions.
- Do not state that every AP provider is automatically a duty-holder. Regardless, safeguarding disclosures may be lawful/necessary; refer to DfE 2026 guidance and the signed commissioner information-sharing agreement.

16 LOCAL SAFEGUARDING PARTNERSHIPS

- Maintain site-relevant arrangements for Tameside and other placing authorities (including Oldham when appropriate), and documented emergency, early help, MASH, LADO and police routes.
- Operation Encompass notifications are handled confidentially, welfare considered and actions recorded where the service is active.

17 TRAINING, QA AND GOVERNANCE

- DSL reviews concern logs, response timeliness, patterns, referral outcomes, staff training, low-level concerns, attendance and off-site safety.
- Governors scrutinise anonymised safeguarding assurance, audit records and overdue actions at least termly; policy is reviewed annually and after a serious incident, guidance change or material risk.

18 LEARNER VOICE, COMPLAINTS AND WHISTLEBLOWING

- Make reporting routes accessible to learners and families, including a trusted adult, complaints channels and independent escalation.
- Children must know how to ask for help. Staff may raise concerns with governors, LADO, children's social care or the NSPCC advice line where internal routes are not suitable.

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19 SAFEGUARDING ASSURANCE RECORDS

- The Principal maintains safeguarding/child-protection documents, staff training records, KCSIE reading acknowledgements, DSL certificates, suitability checks, anonymised case audits, risk assessments and referral records.
- The DSL reviews the operation of these arrangements, records actions and escalates overdue or unresolved safeguarding risks to governance promptly.

20 SAFEGUARDING RESPONSE DEADLINES AND LOG QUALITY

- As an operational rule, staff report concerns immediately on discovery; if unable to reach DSL/deputy they contact children's social care or police themselves where risk warrants. No child should wait for a routine meeting.
- DSL timestamps receipt, triage, consultation, referral, family contact, interim safety controls, agency feedback, assigned action and next review; managers check open cases rather than relying on a filed note.

21 PREVENT DUTY AND RADICALISATION

- Assess signs of vulnerability to extremist grooming and changes in behaviour without stereotyping by religion or identity.
- Staff report concerns to DSL; DSL consults local Prevent/Channel route, police or children's social care when indicated. Record rationale and provision of pastoral support.

22 COUNTY LINES, TRAFFICKING AND EXPLOITATION

- Recognise coercion, unexplained possessions, debt, older associates, missing episodes, changes in school attendance and control by peers/adults as possible exploitation.
- Do not assume willing participation is consent. Risk-assess travel, peer contacts, community locations and internet use; seek coordinated multi-agency help.

23 EARLY HELP AND FAMILY SUPPORT

- Identify emerging need before serious harm. Ask the learner and carers what help would work, where safe, and engage with community-based support and lead professionals.
- A request for early help must not delay statutory referral where significant harm is suspected; record thresholds, consent/lawful sharing and review outcome.

24 SERIOUS VIOLENCE AND WEAPONS

- Consider coercion, peer-group conflicts, threats, violence, harmful material, weapon possession and local exploitation patterns.
- If an immediate threat exists, call 999, protect learners and follow lockdown/emergency planning. Police/social care referrals and site/transport safety plans follow risk assessment.

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25 CHILD MISSING FROM SESSIONS OR CARE

- When a learner fails to arrive, check transport and last known contact, immediately notify the commissioner and carers under safeguarding risk plan, and assess whether the child may be missing/at risk.
- For high-risk absence, escalate promptly to police/social care rather than assuming the family will locate the learner. Maintain a chronology of contacts, actions and outcomes.

26 PROFESSIONAL DISAGREEMENT AND CLOSURE

- DSL may challenge decisions that leave a child unsafe using published escalation routes and senior safeguarding partner consultation.
- Do not close a case merely because an agency declined a referral. Confirm ongoing school/LA support, named worker, protective actions and child voice.

27 OFF-SITE VOCATIONAL AND TRANSPORT SAFEGUARDS

- Before every external placement, check venue risk assessments, adult vetting/supervision, emergency plans, sign-in, handover, safeguarding escalation and contact with Impact DSL.
- Share the minimum necessary learner medical and risk information securely. Stop unsafe activity and inform commissioner promptly where risk cannot be controlled.

28 SAFEGUARDING CASE TRANSFER AND CONTINUITY

- Ask commissioners and previous providers for relevant child-protection information before start; agree clear contact points so no learner enters an information gap.
- On exit, promptly and securely share relevant records with receiving DSL or authorised safeguarding partner, maintaining transfer/receipt log and continuing to act on immediate risks.

29 QUALITY ASSURANCE CYCLE AND CHALLENGE

- Weekly: DSL checks outstanding high-risk concerns. Monthly: Principal samples timeliness of concerns/referrals and repeated incidents. Termly: governance reviews anonymised themes, staff compliance and improvement plan.
- Yearly: external or independent safeguarding review is commissioned where appropriate; record dates, sample sizes, findings, owner, deadline, recheck and governor challenge.

30 LINKED STATUTORY AND DFE GUIDANCE

- Keeping Children Safe in Education 2026 (in force 1 September 2026); Working Together to Safeguard Children 2026 (18 March 2026); Information sharing to safeguard children and young people (10 September 2026; duty 30 September 2026); DfE Non-school alternative provision voluntary national standards (August 2025; non-statutory); DfE Alternative provision statutory guidance (February 2025) This policy is a provider operational policy; the primary guidance and any commissioner requirements take precedence where applicable.

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31 POLICY OWNERSHIP AND REVIEW

- Policy owner: Kate Willis, Principal and Proprietor. Effective date: September 2026. Next review: September 2027, or sooner if legislation, safeguarding guidance, commissioning requirements or provision changes.
- The Principal manages implementation and policy review, with governance oversight where appropriate; relevant staff are informed of updates and confirm understanding.