



Safeguarding and Child Protection Policy

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Policy Statement

Purpose and Scope

The purpose of this policy is to ensure the protection of our students and provide our Students, staff, parents/carers, and the wider community with clear principles, procedures, and best practices within our child-centred and coordinated approach to safeguarding and child protection.

Illuminate AP is committed to safeguarding and promoting the welfare of all students. We achieve this by adhering to current legislation, policies, and guidance concerning the protection of children in England, including but not limited to:

- The statutory guidance 'Working Together to Safeguard Children' (2023) and the Department for Education (DfE) 'Keeping Children Safe in Education' (KCSIE) 2024.
- Local safeguarding procedures, in line with the BCP and Dorset.
- The relevant laws and statutory guidance, including the Human Rights Act 1998, The Children Act 1989 (and 2004 amendment), The Equality Act 2010, and statutory guidance on the Prevent Duty and Female Genital Mutilation (FGM).

Approach and Commitment

We recognise that safeguarding is everyone's responsibility at Illuminate AP. Every staff member has a crucial role in identifying concerns early, providing help, promoting the welfare of students, and preventing concerns from escalating.

This policy reflects our holistic, provision-wide approach to safeguarding and child protection, with a commitment to the following:

- Clear Procedures: We have robust procedures in place to support safeguarding and child protection, ensuring that concerns are identified, reported, and addressed appropriately.
- Compliance with Legislation: Our approach complies with all relevant child protection legislation and guidance.
- A Safe Learning Environment: We are committed to providing a safe environment where students can learn and develop, free from harm.

Supporting Policies

This policy underpins a range of other important policies within Illuminate AP, including:

- Attendance
- Behaviour
- Staff Code of Conduct
- Safer Recruitment
- Online Safety
- Low-Level Concerns
- Whistleblowing
- Formal Complaints Procedure

All Illuminate AP Policies are available at [Illuminate AP | Student Safety Policies](#).

Legal Responsibility

We recognise the responsibility we have under section 175 (or section 157 for independent schools and academies) of the Education Act 2002 to ensure the welfare of children. Safeguarding is a duty shared by all members of staff, who must act in the best interest of the child at all times.

Policy Availability and Review

This policy is publicly available on our website and is reviewed annually at a minimum. Any changes required throughout the year will be made to ensure compliance with the most up-to-date legislation and best practices.

Roles and Responsibilities

At **Illuminate AP**, safeguarding is the responsibility of all staff, including governors. All staff must contribute to creating and maintaining a safe environment where Students can thrive, and the highest standards of safeguarding and child protection are maintained.

All staff are required to:

- Be able to identify and know the role of the **Designated Safeguarding Lead (DSL)**.
- Ensure that they contribute to providing a safe and nurturing environment where Students can learn and flourish.
- Support the best possible outcomes for all Students, contributing to their overall development and well-being.
- Recognise that factors such as **high self-esteem, confidence, supportive friendships, and positive communication** with a trusted adult help to safeguard Students.
- Integrate safeguarding education into the curriculum to help prevent and address risks early.
- Respond appropriately to **any form of sexual violence, sexual harassment, or discrimination**, whether direct or indirect, in line with the AP's **zero-tolerance policy**.
- Be aware of and able to identify **signs of abuse, neglect, exploitation**, and any other safeguarding issues, including **unexplained or persistent absences** from education.
- Act promptly and appropriately when safeguarding concerns arise, following the procedures set out in this policy and local child protection guidelines, ensuring accurate record-keeping and effective collaboration with other agencies.

All staff working directly with Students are required to read and understand **Part 1** and **Annex B** of the **KCSIE 2024** guidance. Staff who do not work directly with Students must read and understand **Part 1** or **Annex A** of the guidance. Additionally, all staff must be familiar with and adhere to the **staff code of conduct**. The staff code of conduct is included in the onboarding of new staff members and individually signed and acknowledged by each new employee.

The Role of the Designated Safeguarding Lead (DSL)

The **DSL** at **Illuminate AP** holds primary responsibility for safeguarding and child protection, including online safety. This includes ensuring that systems for monitoring and filtering online content on **Illuminate AP** devices and networks are robust and effective.

The key responsibilities of the DSL include:

- Having a deep understanding of **referral processes** and **threshold criteria** for safeguarding concerns and ensuring knowledge of referral mechanisms in place for partner local authorities.
- Making sure all staff are aware of how to **raise safeguarding concerns** and report issues.
- Ensuring that all staff are able to identify signs of **child abuse, neglect, and exploitation**.
- Acting as a source of **support, advice, and guidance** for staff on safety and safeguarding matters, particularly when making decisions about referrals to external agencies.
- Understanding local, contextual, and national safeguarding issues, including **child-on-child abuse** and **harmful sexual behaviour**, and ensuring the appropriate local response and support is available.
- Participating in **strategy discussions** and **multi-agency meetings** or supporting other staff to do so when appropriate.
- Keeping safeguarding and child protection files updated and accurate.

- Monitoring the progress of Students on the safeguarding list, including those receiving **Early Help**, those on a **Child Protection Plan (CP)**, **Child in Need (CiN) Plan**, or identified as a **Child Looked After (CLA)**.
- Contributing to the assessment of Students and their safeguarding needs.
- The Designated Safeguarding Lead (DSL) is directly involved in the development, review, and ongoing oversight of this and all other policies under Illuminate AP, ensuring they align with statutory safeguarding guidance and reflect best practice across the provision.

In the absence of the DSL, the **Deputy Designated Safeguarding Lead(s) (DDSL)** will assume full responsibility for safeguarding and child protection.

Training and Development

At **Illuminate AP**, staff training on safeguarding and child protection is a key priority. Staff will be trained to identify signs of **abuse, neglect, exploitation**, and specific safeguarding issues, including **online safety**, and will be provided with regular updates to maintain awareness.

Our staff training programme includes:

- **Induction Training:** All new staff will receive thorough safeguarding training upon joining, in line with **KCSIE** requirements. This includes an introduction to the safeguarding policies and procedures in place at Illuminate AP.
- **Universal (Level 1) Safeguarding Training:** All staff will receive formal safeguarding training every three years, delivered by an external approved provider. In addition, regular safeguarding briefings and updates will be provided throughout the academic year by the DSL and DDSL's of Illuminate AP.
- **Ongoing Development:** Key safeguarding information will be shared regularly by the DSL and DDSL(s) through briefings and updates. Staff will also stay up to date with training on key safeguarding issues, such as **Prevent Duty**, **Female Genital Mutilation (FGM)**, and **Safer Recruitment**.

The DSL and DDSL(s) will have undertaken, as a minimum, the 'Targeted (Level 3) Designated Safeguarding Lead Training' by an external approved provider. This will be updated every two years in accordance with guidance.

Key Contacts

| Role | Name | Contact Details |
|--|---------------------------------|--|
| Designated Safeguarding Lead (DSL) | Rebecca Freeman | Rebecca@illuminateap.co.uk |
| Deputy Designated Safeguarding Lead (DDSL) | Laura Cope | Laura@illuminateap.co.uk |
| Members of staff who have also received the Designated Person training | Ben Arnold Charlotte Johnson | Ben@illuminateap.co.uk Charlottej@illuminateap.co.uk |
| The Designated Teacher (DT) | Laura Cope | Laura@illuminateap.co.uk |
| | | |

| | |
|--|--|
| Local Authority Designated Officer (LADO) | BCP: LADO@bcpcouncil.gov.uk 01202817600 Dorset: LADO@dorsetcouncil.gov.uk 01305221122 Pan-Dorset Safeguarding Children: West Team: |
| | County Hall Colliton Park Dorchester Dorset DT1 1XJ Tel: 01305221196 East Team: North Bournemouth Local Office (NBLO) 27 Slades Farm Road Bournemouth BH10 4ES Tel: 01202127465 |
| Children's Social Care – for reporting concerns | If the child lives in Dorset - Chad: 01305 228558 If the child lives in Bournemouth, Christchurch or Poole Children's first response hub: 01202123334 or email direct: childrensfirstresponse@bcpcouncil.gov.uk |
| Emergency Duty Service – after hours, weekends and public holidays | Dorset: Chad: 01305 228558 BCP: 01202 738256 ChildrensOOHS@bcpcouncil.gov.uk |
| Local Authority Prevent Co-ordinator: | BCP / Dorset: call 01202 229 319 or email dorsetprevent@dorset.police.uk. You can also call the national police Prevent advice line 0800 011 3764 Police: 101 (non-emergency) or 999 (emergency) Anti-terrorist hotline: 0800 789 321 NSPCC: 0808 800 500 Ofsted: 0300 123 1231 |

Procedures

Safeguarding and Child Protection Procedures

Our safeguarding and child protection procedures are in full accordance with the relevant statutory guidance, including:

- [Keeping Children Safe in Education \(KCSIE\) 2024](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [The Prevent Duty](#)

To ensure the effectiveness of our safeguarding processes, key contact information will be regularly communicated to our Students, staff, parents/carers, and referrers. This ensures that all stakeholders are aware of how to raise concerns and seek support when necessary.

Procedures in this policy are further supported by other Illuminate AP policies (see appendix D) and our overarching approach to safeguarding, based on the principle of “**it could happen here.**” We recognise that some children may face an increased risk of abuse, including those with **Special Educational Needs and Disabilities (SEND)** or those who are, or have been, under the care of a social worker. Illuminate AP’s procedures and ethos are child-centred, ensuring that all decisions are made in the **best interests of the child**. Our commitment is to protect and promote the educational outcomes and aspirations of every child, regardless of the challenges they may face.

In all instances, if staff are ever uncertain about a situation, they should immediately consult with the **Designated Safeguarding Lead (DSL)** or the **Deputy Designated Safeguarding Lead(s) (DDSL)**.

Commitment to Safeguarding Across All Activities

Our dedication to safeguarding applies not only during the regular school day but also extends to **before and after school activities**, both on and off the school premises. This includes situations where our facilities are used by external providers, such as sports coaches or other extracurricular activities. Staff are expected to maintain the same high safeguarding standards in all these scenarios.

Confidentiality and Information Sharing

At **Illuminate AP**, we recognise that the **Data Protection Act (DPA) 2018** and **UK GDPR** do not prevent or limit the sharing of information when it is necessary to keep children safe. Timely information sharing is critical to effective safeguarding, and we will always ensure that it is done responsibly.

We follow strict confidentiality protocols that are aligned with the following guidance:

- **Information Commissioner's Office (ICO)** for organisations
- **DfE non-statutory information sharing advice for practitioners providing safeguarding services** to children, young people, parents, and carers.

Child protection records are generally exempt from the disclosure provisions of the Data Protection Act, meaning that Students and parents/carers do not have an automatic right to access them. Should a staff member receive a request to view child protection records, they must refer the request to the **Designated Safeguarding Lead (DSL)**.

We ensure that information is shared strictly on a '**need to know**' basis, including instances such as **Domestic Abuse notifications** and through **Operation Encompass**. Operation Encompass facilitates communication between the Police and schools when a child has been exposed to a domestic abuse incident. While **Illuminate AP** does not directly receive these notifications, we rely on communication from the child's registered school to ensure appropriate support is provided.

Record Keeping

We maintain accurate and detailed records of all concerns regarding Students, ensuring that these records include:

- The **date**, **location**, and details of the incident
- A summary of how the concern was followed up and resolved.
- The **actions taken**, rationale for decisions made, and the **outcomes** reached.

Illuminate AP uses **CPOMS** and **CPOMS Staff Safe** to document and track concerns.

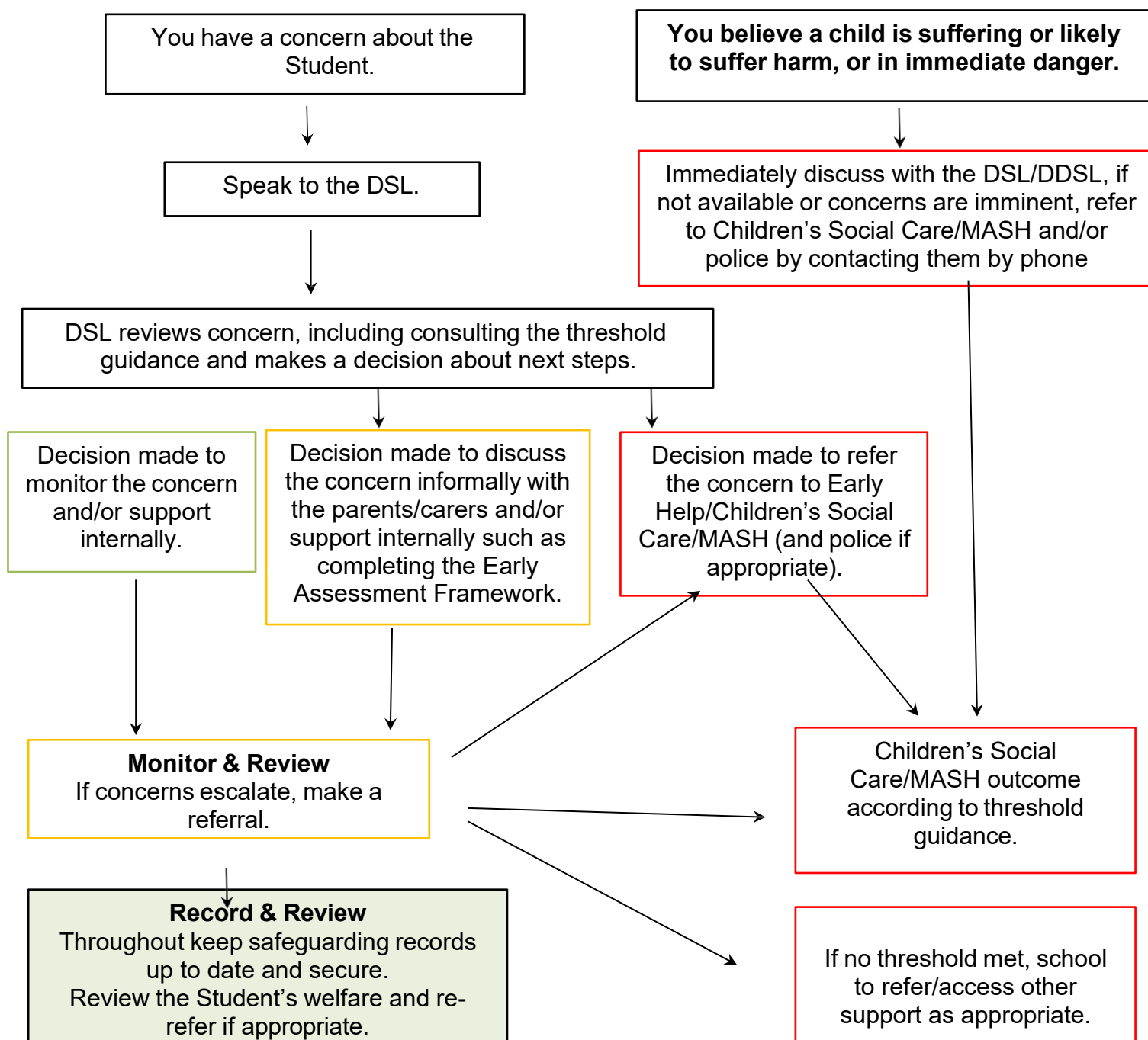
All concerns and referral records are stored securely in a separate **child protection file** for each Student. Each record includes a comprehensive summary of the concerns raised, ensuring clear documentation of the entire safeguarding process.

When sharing information, we adhere to the principles of only sharing data that is **necessary**, **proportionate**, **relevant**, **adequate**, and **accurate**.

For Students who transfer to a different school or educational establishment, we send all relevant child protection records securely within **5 days** for in-year transfers, or within the first 5 days of the new term if the Student moves at the end of a school year. These records are sent separately from the main Student file, and we obtain confirmation of receipt. The records include details of all referrals and involvement from **Children's Social Care**, the **Youth Justice Team**, and **Early Help**, regardless of the outcome of these referrals.

Procedure for when you are concerned about a Student

We define safeguarding as: protecting children from maltreatment (including within and outside of the home and online), ensuring they can develop mentally, physically, and socially in a safe environment, further enabling them to have the best outcomes. Staff will take action immediately and appropriately if they have any concerns about a child, providing help and support as soon as problems emerge.



Procedure for FGM, Preventing Radicalisation and Mental Health

There is an FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015). FGM is illegal in the UK and a form of child abuse.

The Prevent Duty (under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015)) requires schools to have due regard to the need to prevent people from becoming terrorists or supporting terrorism, extremist ideology, and racialisation.

Schools have an important role to play in supporting the mental health and wellbeing of their Students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

| FGM | Radicalisation | Mental Health |
|--|---|---|
| <p>If you discover that FGM has taken place, or a Student is at risk of FGM the DSL must immediately report this to the police. Following this, contact will then be made to Children's Social Care.</p> <p>Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.</p> <p>Any other member of staff who discovers that an act of FGM appears to have been carried out they must speak to the DSL and follow our local safeguarding procedure.</p> <p>Any member of staff who suspects a Student is <i>at risk</i> of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.</p> <p>Female Genital Mutilation - BCP Safeguarding Children Partnership and the Dorset Safeguarding Children Partnership</p> <p>Mandatory reporting of female genital mutilation: procedural information - GOV.UK</p> | <p>If there is an immediate threat, call 999.</p> <p>If you have concerns that a Student may be at risk of radicalisation, discuss this with the DSL immediately.</p> <p>This may then include making a Prevent referral</p> <p>For further information visit Making a referral to Prevent - GOV.UK</p> <p>Prevent - BCP Safeguarding Children Partnership and the Dorset Safeguarding Children Partnership</p> | <p>If you have a mental health concern about a Student that is also a safeguarding concern and/or the wider safeguarding concern is further impacting on the Student's mental health, follow the process on page 11.</p> <p>If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.</p> |

Child-on-Child Abuse

Our zero-tolerance approach to any form of child-on-child abuse is supported by our pastoral curriculum, PSHE curriculum and Positive behaviour policy.

All staff recognise that children can abuse their peers (both online and offline) including, bullying, abuse in intimate personal relationships between children, physical abuse, sexual abuse, sexual violence and harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos, upskirting, initiation/hazing type violence and rituals.

Children can contact Childline confidentially on 0800 1111.

If a concern is raised relating to the nudes/semi nudes, we will respond in accordance with [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

We recognise that some groups are potentially more at risk. Evidence shows that girls, children with special educational needs and disabilities (SEND), and children who are lesbian, gay, bisexual, or questioning their gender are at greater risk. Students with SEND or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers and we offer additional support for these Students, this includes:

Within Illuminate AP we have Sanctuary Spaces, these are designated spaces designed to offer a young person a safe space to discuss any concerns in a low-stimulus environment.

Safeguarding concerns involving Students with SEND will require close liaison with the DSL and/or DDSL and the child's registered provision SENCO or SEN Case Officer.

Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

We will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. We are clear that sexual abuse, violence, and harassment is not acceptable, and will never be tolerated and is not an inevitable part of growing up.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Procedure for child-on-child abuse

We will follow the procedure on page 11, but we will ensure in all cases:

- The DSL is informed.
- All staff understand and will challenge inappropriate behaviour between children.
- Our response to child-on-child abuse will be immediate and supportive for all involved, and we will work with key agencies if appropriate to mitigate any further risks (such as; parents/carers, Police, Children's Social Care).
- We will reassure victims that they are taken seriously and will be supported and kept safe. A risk assessment if appropriate will be created for all involved.

All allegations of child on child abuse will be recorded on CPOMS for immediate action by the DSL or DDSL.

Online Safety

Online Safety Approach

At **Illuminate AP**, our approach to online safety focuses on addressing the four categories of risk:

- **Content:** Exposure to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.
- **Contact:** Harmful online interactions, including peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial, or other purposes.
- **Conduct:** Personal online behaviour that could lead to or cause harm, such as the creation, sending, and receiving of explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes), sharing other explicit content, and engaging in online bullying.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing, and financial scams.

We acknowledge the importance of protecting children from potentially harmful and inappropriate online content. Technology is an integral part of safeguarding and plays a significant role in many wellbeing concerns.

Online Safety Procedure

If any staff member has safeguarding concerns linked to online safety, filtering, or monitoring, they are required to report these concerns to the **Designated Safeguarding Lead (DSL)** immediately. The concern will be logged appropriately on **CPOMS** and recorded in the online safety, filtering, and monitoring log. These concerns are shared appropriately with individual members of staff, including the DSL, DDSL's and individual Teachers and Mentors.

Supporting Our Online Safety Framework

Our online safety procedures are supported by the following actions and policies:

- The **DSL**, **Senior Leadership Team (SLT)**, and our **IT provider** lead the oversight of filtering and monitoring systems, with the support of the entire **Illuminate AP community**.
- We have robust processes in place, including advanced filtering and monitoring systems to ensure safe use of the internet and digital resources.
- We provide education on the responsible and safe use of technology, including mobile and smart technology, to students, staff, and parents/carers.
- **Clear guidelines** are set for the use of mobile phones and other devices across the **Illuminate AP community**.
- **Mechanisms** are established to identify, intervene in, and escalate incidents or concerns related to online safety.
- We **regularly review** our filtering and monitoring systems, at least annually, to ensure their effectiveness and compliance with relevant standards.

Our online safety practices adhere to the government's **filtering and monitoring standards** for schools, as outlined in the guidance, "**Meeting Digital and Technology Standards in Schools and Colleges**" (GOV.UK). We also ensure that **cybersecurity standards** are met, following training guidelines provided by **NCSC.GOV.UK**.

Training and Education

Regular staff training is conducted during induction and throughout the academic year on online safety, safeguarding concerns related to the online world, and filtering and monitoring systems.

Online safety education is provided regularly to staff, Students, and parents/carers to raise awareness of current risks and best practices.

We ensure open communication with parents/carers regarding online safety, as well as our filtering and monitoring processes, to foster a secure and supportive environment both at school and at home.

Other important procedures

At Illuminate AP, we closely monitor the attendance of all Students, with particular attention to those who have additional vulnerabilities. This includes tracking Students who are absent from school, those with unexplained absences, and Students who are persistently or severely absent from education.

We ensure that all attendance procedures align with our Attendance Policy, which is accessible via our website. This policy is designed to support schools in working in line with the government's guidance, Working Together to Improve School Attendance (effective from 19 August 2024).

We collaborate closely with local authorities and the Education Welfare Service to address any attendance concerns.

For children who are missing from education, Illuminate AP will work with the child's registered school to follow the procedure set out by the Local Authority's Children Missing Education guidance.

For Students who have a social worker or are under the supervision of a youth justice worker, we ensure that any unauthorised absences, suspensions, or potential placement disruptions are promptly reported to Children's Social Care and other relevant professionals as required.

Exploitation

We recognise that Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of child abuse. In addition to Illuminate AP's normal safeguarding processes and protocols, if we suspect that a Student is being exploited, Illuminate AP will respond immediately, taking the following actions:

- Contacting the Police and/or Children's Social Care for immediate intervention.
- Completing the relevant exploitation assessment tool and submitting it to the child's Local Authority Exploitation Service for further action.
- Contracting and sharing relevant information, where appropriate, with key professionals involved in the young person's care—this includes, but is not limited to, the Designated Safeguarding Lead (DSL) from the referring or host school, the referring caseworker, and any allocated social workers.

Critical Incidents and Child Deaths

In the event of a critical incident, Illuminate AP will take immediate action by contacting Children's Social Care to ensure an appropriate multi-agency response.

In the unfortunate event of a child death, whether expected or unexpected, we will follow the procedures set out by the Local Authority's Child Death Review Panel, ensuring that all actions are in line with the required protocols and guidance.

Working Together

We will take an active role and work collaboratively with key agencies regarding child protection, safeguarding, education, welfare, and attendance matters. We will provide written reports at child protection conferences and core groups.

Local key agencies include but not limited to:

- Education Welfare Service
- Youth Justice Team
- Local Authorities Safeguarding Hub
- Children's Social Care
- Other Alternative Provision Providers
- SEMH Inclusion Team
- BPC and Dorset Special Education Needs Department
- Public Health Team
- Exploitation and Missing Prevention Team
- Police
- LADO
- Child and Adolescent Mental Health Services (CAMHS)

For those Students who have a social worker and/or youth justice worker, we will notify the Youth Justice Team and/or Children's Social Care if:

- A suspension and/or exclusion is a possible next step.
- If there are unexplainable and/or persistent/severe absences from education, unauthorised absence, or missing education where there are known safeguarding risks.
- There is a change in the Student's behaviour and/or circumstances that raises safeguarding concerns.
- The provision in place requires review.

Illuminate AP will be aware of the requirement for children to have an Appropriate Adult while being questioned or detained by the Police (Police statutory guidance, PACE Code C 2019).

We will follow Resolving Professional Difference of Opinion and Escalation policy as necessary [Resolving Professional Difference of Opinion and Escalation \(proceduresonline.com\)](https://proceduresonline.com) to ensure we can learn and understand the decision-making process of other agencies as well as challenge sensitively to ensure our Student's welfare and safety is paramount.

Communication with Parents/Carers

At Illuminate AP, our approach to communication with parents and carers aligns with the four principles set out in the statutory guidance: Working Together to Safeguard Children 2023. We are committed to working in partnership with families to ensure the safety and well-being of every child in our care.

In addition, we will:

- Ensure that parents/carers are fully informed of the responsibility placed on Illuminate AP and its staff in relation to child protection and safeguarding.
- Engage in appropriate discussions with parents/carers prior to the involvement of external agencies, unless circumstances prevent such action. If we believe that notifying

parents/carers could increase the risk to the child or worsen the situation, we will seek guidance from Children's Social Care before proceeding.

- Regularly communicate key safeguarding information relevant to parents/carers, including how they can support their child's safety at school, in the community, and online. We will also ensure they are aware of our filtering and monitoring systems for online safety.

Our communication with parents and carers aims to foster a collaborative and transparent approach to safeguarding, ensuring that they are actively involved in promoting the welfare of their children.

Important Safeguarding Contacts at Illuminate AP.

| Person | Position | Contact Details |
|-------------------|--|--|
| Rebecca Freeman | Operational Managing Director and Designated Safeguarding Lead | Rebecca@illuminateap.co.uk 01202 087785 |
| Arran Bayle | Adversio Education Director | Arran@adversio.group |
| Brian Murphy | Adversio Education Director | Brian@adversio.group |
| Laura Cope | Curriculum Manager and Deputy Designated Safeguarding Lead | Laura@illuminateap.co.uk 01202 087787 |
| Ben Arnold | Lead Mentor and Deputy Designated Safeguarding Lead | Ben@illuminateap.co.uk 01202 087788 |
| Charlotte Johnson | Senior Mentor and Deputy Designated Safeguarding Lead | CharlotteJ@illuminateap.co.uk 01202 119820 |

Safer Recruitment, low-Level concerns, and allegations against staff.

At **Illuminate AP**, we are committed to operating robust **safer recruitment practices** in line with statutory guidance, including **Keeping Children Safe in Education (KCSIE) 2024**, and **Bracknell Forest's Safer Recruitment Toolkit**. These procedures include conducting appropriate **Disclosure and Barring Service (DBS)** checks, identity checks, and reference checks for all staff and volunteers. Our recruitment processes are designed to deter and prevent unsuitable individuals from applying for, securing, or volunteering in roles where they will be working with children.

We ensure that at least one member of the recruitment panel has completed **Safer Recruitment training**. Additionally, as part of our safer recruitment protocols, the school may conduct **digital screening** of potential new staff at the shortlisting stage.

Allegations and Low-Level Concerns

All allegations made against staff or volunteers will be taken seriously and handled with confidentiality. When necessary, we will seek advice from the **Local Authority Designated Officer (LADO)** and our **Human Resources Partners** to ensure appropriate management of concerns.

We adhere to our **Low-Level Concerns Policy**, which is designed to handle concerns that may not meet the threshold for a formal referral to the LADO but nonetheless require attention. A low-level concern may arise if:

- The concern is inconsistent with the [Staff Code of Conduct](#).
- The concern does not meet the threshold for serious allegations but still warrants monitoring or further discussion.

The purpose of the **Low-Level Concerns Policy** is to foster a culture of openness, trust, and transparency, where the values and expected behaviour outlined in the staff code of conduct are continually upheld, monitored, and reinforced by all staff members.

We utilise **CPOMS Staff Safe** to support the management and recording of concerns regarding staff behaviour or conduct.

If there is any uncertainty about whether a concern or allegation meets the **harm threshold**, we will consult with the **LADO** for guidance.

Staff Conduct and Policies

All staff members at **Illuminate AP** are required to read and understand the following policies:

- [Staff Code of Conduct](#)
- [Low-Level Concerns Policy](#)
- [Whistleblowing Policy](#)

Low-level concerns and **allegations** will be recorded securely and managed confidentially, with access limited to those who need to know.

Professional Boundaries and Safeguarding

It is imperative that all staff understand that **sexual relationships** with Students under the age of 18 are illegal and could result in legal action under the **Sexual Offences Act 2003 (Abuse of Trust)**.

Additionally, all communication between Students and staff must take place through **Illuminate AP devices and platforms**, ensuring transparency and maintaining professional boundaries. These

communications will be open to scrutiny at all times to ensure they are conducted within appropriate and clear boundaries.

Procedure for managing safeguarding concerns and allegations made about staff, including supply teachers, contractors, and out-of-school setting providers

All staff must know how to recognise an allegation and who to report to.

ALLEGATION

This might arise as a complaint, grievance, suspicion, concern, during discussions from child, parent, member of staff or member of the public.

If an allegation concerns a member of SLT, Illuminate AP Directors will take action these are contactable Arran@adversio.group and Brian@adversio.group

Do not tell anyone, particularly the staff involved.

Take advice from the Local Authority Designated Officer (LADO) before taking any action. Make initial enquiries only. Do not investigate or interview. Usual principles of confidentiality apply.

Deal objectively with everything. Existing loyalties must be put to one side.

Think the unthinkable, believe the unbelievable.

Keep detailed records of actions and statements at all stages.

**Report to Managing Operations Lead –
Rebecca@illuminateap.co.uk**

**Discussion between DSL, Operations Lead and
Local Authority Designated Officer (LADO)**

Refer back to Illuminate AP
(keeping in line with low level concern policy)

Referral form to LADO

The next course of action and timescales are agreed at this point. Consider also:

information for the adult, witnesses, child/young person, and parents/carers
on-going support for the member of staff, Student and parents/carers
statements, if needed, for the whole staff, community, and press

*NSPCC Whistleblowing
Helpline 0800 028 0285*

*Illuminate AP's
[Managing Allegations Policy](#)
[Low Level Concerns Policy](#)*

Appendix A

Abuse, Neglect and Exploitation (extracted from Keeping Children Safe in Education (2024))

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

All staff are aware that CCE and CSE are forms of child abuse.

Appendix B

Linked policies (this is not intended to be an exhaustive list):

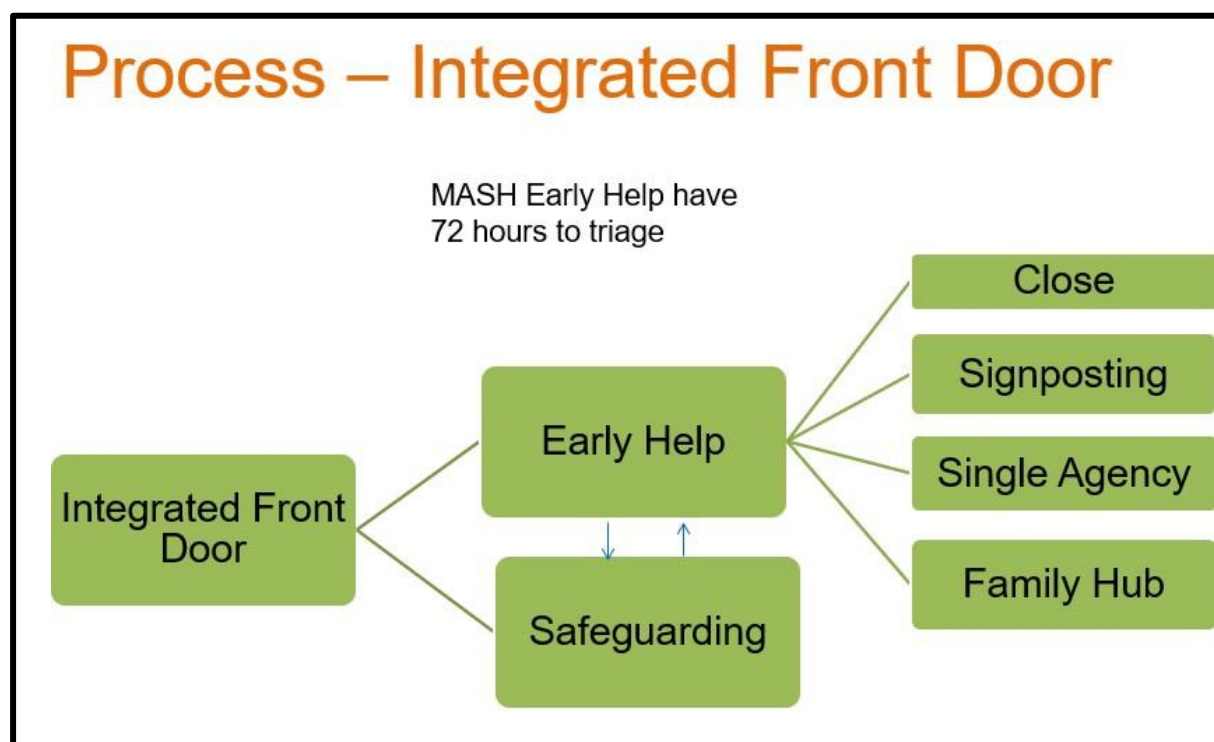
RELEVANT ADDITIONAL POLICIES

- Attendance policy
- [Positive Behaviour policy](#)
- [Managing Allegations](#)
- [Equality, Diversity and Inclusion policy](#)
- [Health and safety policy](#)
- [GDPR policy](#)
- [Low level concerns policy](#)
- [Medical conditions & administration of medicines policy](#)
- [Mobile phone and social networking policy](#)
- [Positive handling and physical intervention policy and guidance](#)
- [Safer Recruitment](#)
- [Staff code of conduct](#)
- Staff disciplinary policy and procedures/disciplinary rules
- [Whistleblowing policy](#)

All Policies and procedures available on request by contacting Rebecca@illuminateap.co.uk.

Specific Safeguarding Issues (this is not an exhaustive list, please refer to Keeping Children Safe in Education, in particular Annex B)

Bullying including cyber bullying
Child abduction and community safety incidents
Child Sexual Exploitation (CSE)
Child Criminal Exploitation (CCE)
Children and the court system
Children missing from Education
Children of substance misusing parents/carers
County lines
Domestic abuse
Substance abuse
Fabricated or induced illness
Formal complaint policy
Children with family members in prison
Faith abuse
Female Genital Mutilation (FGM)
Forced Marriage Gangs and Youth Violence
Gang Activity
Gender based violence/violence against women and girls (VAWG)
Hate crime
Mental health
Homelessness
Health and well-being
So called 'Honour-based' abuse
Child-on-Child abuse
Consensual and non-consensual sharing of indecent images/nude/semi-nude images/videos
Sexual violence and sexual harassment between children in schools
Private fostering
Preventing radicalisation (The Prevent Duty)
Online abuse including indecent images/nude/semi-nude images/videos
Teenage relationship abuse
Trafficking
Missing children and vulnerable adults
Child sexual abuse within the family
Poor parenting, particularly in relation to babies and young children
Serious violence
Cyber crime



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Appendix E

Links to Further Guidance:

[Behaviour in schools guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

DfE harmful online challenges and hoaxes [Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

DfE Keeping Children Safe in Education (September 2024) [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Farrer & Co [addressing-child-on-child-abuse.pdf \(farrer.co.uk\)](https://farrer.co.uk)

Governance Guides [Maintained schools governance guide - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and [Academy trust governance guide - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[HM Government - Multi-agency statutory guidance on Female Genital Mutilation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Keeping children safe: code of practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Multi Agency Statutory Guidance on Female Genital Mutilation (July 2020) – [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

NSPCC Harmful Sexual Behaviour Framework <https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Promoting the education of looked-after children and previously looked-after children \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Serious Violence Home Office Strategy <https://www.gov.uk/government/publications/serious-violence-strategy>

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Special educational needs and disability code of practice: 0 to 25 years
[SEND Code of Practice January 2015.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Supporting Students at school with medical conditions \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

What to do if you're worried a child is being abused (Advice for Practitioners, March 2015) -
[Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
[Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106506/Working_together_to_safeguard_children_2023_statutory_guidance.pdf)

[Working together to improve school attendance \(applies from 19 August 2024\)
\(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106506/Working_together_to_improve_school_attendance_2024_statutory_guidance.pdf)