

Title	Child Protection and Safeguarding Policy
Cross References	External: • Keeping Children safe in Education 2026 • Working Together to Safeguard Children 2026 • Children Act 1989 and 2004 • Education Act 2002 • Counter Terrorism and Security Act 2015 • Equality Act 2010 • UK GDPR and Data Protection Act 2018 Internal: • Safer Recruitment Policy • Managing Allegations Against Staff Policy • Staff Code of Conduct • Online Safety Policy • Anti Bullying Policy • Attendance Policy • Complaints Policy • Data Protection and Privacy Policy • Whistleblowing Policy
Date	October 2026

1. Policy Statement

Apricot Online Ltd is an online alternative education provider. Our students may be accessing education from home, another education setting or another agreed location, and many have experienced disrupted education, anxiety, SEND, health needs, exclusion or other barriers to attendance. Safeguarding in an online setting therefore requires staff to remain alert not only to what a child says, but also to changes in attendance, engagement, written communication, behaviour, presentation, background sounds, online activity and other indicators that may suggest a child needs help or protection.

Apricot Online adopts an 'it could happen here' approach. Safeguarding and promoting the welfare of children is everyone's responsibility. All staff must maintain a child-centred approach and act immediately where they have a concern.

This policy is written specifically for Apricot Online's remote model. It reflects the principles and expectations of Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026, applied appropriately to an online alternative provision context.

2. Definition of Safeguarding

For the purposes of this policy, safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment, including harm outside the home and online; preventing impairment of children's mental and physical health or development; ensuring children grow up with safe and effective care; and taking action to enable all children to have the best outcomes.

A child is anyone under the age of 18.

3. Apricot Online Safeguarding Ethos

Apricot Online aims to provide a safe, respectful and predictable online learning environment in which students feel listened to and able to raise concerns. For some students, regular online lessons may provide one of their most consistent contacts with professionals outside the home.

We will:

- place the welfare of the child at the centre of decision-making;
- respond promptly to concerns, disclosures, changes in behaviour and unexplained changes in attendance or engagement;
- recognise that children may experience abuse, neglect or exploitation within or outside the home and through technology;
- recognise that students with SEND, communication needs, anxiety, trauma or disrupted education may face additional barriers to disclosure;
- maintain clear professional boundaries in all online communication and live teaching;
- work closely with commissioning schools, local authorities, parents/carers and other agencies;
- ensure safeguarding concerns are recorded securely and shared on a need-to-know basis;
- teach and reinforce online safety through the curriculum and day-to-day practice; and
- review safeguarding practice regularly and learn from incidents, concerns and emerging risks.

4. Key Safeguarding Contacts

Name	Role	Contact
Jodie Phillips	Operations Director / Designated Safeguarding Lead (DSL)	jodie@apricotlearningonline.co.uk
Amy Smith	Managing Director / Deputy Designated Safeguarding Lead (DDSL)	amy@apricotlearningonline.co.uk

Where a concern relates to the DSL, it must be reported to the Managing Director. Concerns relating to staff behaviour must be managed in accordance with the Managing Allegations Against Staff Members Policy and the Staff Code of Conduct.

5. Roles and Responsibilities

5.1 All Staff

All staff must read Part One of KCSIE 2026 in full, complete required safeguarding training and understand Apricot Online's safeguarding systems and reporting routes.

- Maintain an 'it could happen here' attitude and act in the best interests of the child.
- Know the DSL and DDSL and how to contact them.
- Recognise indicators of abuse, neglect, exploitation, online harm and other safeguarding concerns.
- Report and record concerns without delay, even where the information appears minor or incomplete.
- Never promise confidentiality to a child.
- Do not investigate concerns or ask leading questions; listen, clarify only where necessary and pass information on.
- Be aware that data protection law does not prevent necessary information sharing for safeguarding purposes.
- Follow Apricot Online's professional-boundary, online-safety and communication requirements.
- Challenge or escalate concerns where they believe appropriate safeguarding action has not been taken.

5.2 Designated Safeguarding Lead and Deputy

The DSL has lead responsibility for safeguarding and child protection within Apricot Online. The DDSL is trained to the same standard and supports or acts for the DSL as required.

- receive, assess and respond to safeguarding concerns;
- manage referrals and liaise with children's social care, police, LADO, Channel/Prevent partners and other agencies where appropriate;
- liaise promptly with the DSL or named safeguarding contact at the commissioning school or local authority;
- maintain secure safeguarding records and ensure decisions, rationale, actions and outcomes are recorded;
- support staff who raise concerns and provide safeguarding advice;
- ensure safeguarding and child protection training remains current;
- understand local safeguarding arrangements relevant to students' locations;
- review patterns and themes across concerns, attendance and engagement;
- ensure child protection information is transferred securely where required; and
- ensure the child's views are considered and that safeguarding decisions remain child-centred.

5.3 Senior Leadership

Senior leaders are responsible for maintaining a culture in which safeguarding is prioritised, concerns can be raised without fear, staff understand their responsibilities, safer recruitment is applied and weaknesses are addressed promptly.

6. Partnership with Commissioning Schools and Local Authorities

Apricot Online commonly provides education to a child who remains on roll with a commissioning school or whose placement is arranged by a local authority. Safeguarding is therefore a shared professional responsibility and effective communication is essential.

Before or at the start of a placement, Apricot Online expects the commissioner to provide appropriate safeguarding and contact information, including the child's current location/address where required for emergency safeguarding, the name and contact details of the commissioning DSL or child protection contact, relevant known risks and any agreed arrangements for attendance monitoring or supervision.

Apricot Online will notify the commissioning safeguarding contact promptly when a concern arises. However, Apricot Online will not delay action where a child appears to be at immediate risk or where the commissioning contact cannot be reached. The Apricot DSL may contact children's social care, police, emergency services or another appropriate agency directly and will inform the commissioner as soon as practicable.

Commissioning arrangements do not remove Apricot Online's responsibility to act on concerns identified through our provision.

7. Safeguarding in Live Online Lessons

Safeguarding arrangements are designed around the reality that Apricot Online staff and students are not normally in the same physical location.

- Students and staff use individual, authenticated accounts for Apricot Online systems.
- Virtual classrooms use controlled access arrangements designed to prevent unauthorised entry.
- Live lessons are recorded in accordance with Apricot Online's operational, safeguarding and data-protection arrangements. Recordings may be reviewed where a safeguarding, conduct or quality concern is raised.
- The DSL/DDSL or authorised senior staff can access live teaching environments where required for safeguarding or quality assurance.
- Staff must use approved Apricot Online platforms and communication routes for contact with students.
- Staff must not connect with students through personal social-media accounts or move professional communication to unapproved personal channels.
- Staff should remain alert to concerning comments, messages, images, usernames, screen-shared material, background sounds or activity, changes in behaviour, sudden disconnection, distress or other indicators of risk.
- Where cameras are not used, staff must not assume that the absence of visual indicators means that a child is safe. Greater weight may need to be placed on voice, language, written communication, attendance and patterns over time.
- Where another person enters or appears to influence a student's online lesson in a concerning way, staff must record and report the circumstances.
- Staff must not record lessons or student interactions using personal devices.

8. Responding to a Safeguarding Concern

Any concern about a child's welfare must be acted on immediately.

1. If there is an immediate danger or medical emergency, staff must alert the DSL immediately and emergency services should be contacted where necessary.
2. Listen to the child and take what they say seriously. Do not promise secrecy, investigate, interrogate or ask leading questions.
3. Record the concern as soon as possible using Apricot Online's safeguarding reporting system/green form. Record the child's own words where possible, together with date, time, context and any relevant online interaction.
4. Inform the DSL/DDSL without delay. A written record does not replace urgent verbal contact where the concern is serious.
5. The DSL will assess the information, consider existing concerns and context, liaise with the commissioner and/or statutory agencies as appropriate and record decisions, rationale, actions and outcomes.
6. Where the member of staff remains concerned that appropriate action has not been taken, they must escalate to another senior safeguarding lead and use whistleblowing routes where necessary.

Apricot Online's role is to recognise, respond, record and refer. Staff must not undertake their own child-protection investigation.

9. Safeguarding Records and MyConcern

Safeguarding information must be recorded promptly, accurately, factually and securely. Apricot Online uses its designated safeguarding reporting arrangements, including MyConcern where applicable.

Records should include:

- a clear summary of the concern;
- the date, time and source of the information;
- the child's own words where relevant;
- what was observed, heard or received online;
- actions taken and by whom;
- decisions made and the rationale for those decisions;
- communications with the commissioner, parent/carer or agencies; and
- the outcome or next steps.

Safeguarding records are confidential and shared only with those who need the information to safeguard the child. Records must be retained and transferred securely in accordance with applicable safeguarding, data-protection and records-retention requirements.

10. Information Sharing and Confidentiality

Staff have a professional responsibility to share information where this is necessary to protect a child. Data protection law is not a barrier to appropriate safeguarding information sharing.

Parents/carers will normally be informed about concerns and referrals where appropriate, but information must not be shared with them where doing so may place the child or another person at increased risk, prejudice an investigation or otherwise be contrary to safeguarding advice.

Students and parents/carers do not have an automatic right to unrestricted access to child-protection records. Any request for access will be managed in accordance with data-protection law and safeguarding considerations.

11. Early Help, Family Help and Multi-Agency Working

Apricot Online recognises that children benefit when difficulties are identified early. Staff should be particularly alert where a child has SEND or health needs; is a young carer; is persistently absent from education; is affected by domestic abuse, parental offending or substance misuse; is at risk of exploitation, trafficking, radicalisation, honour-based abuse or homelessness; or is experiencing other circumstances that increase vulnerability.

Where a student may benefit from help or protection, the DSL will work with the commissioning setting and relevant agencies. Apricot Online will contribute relevant information to assessments, meetings and plans where requested and appropriate.

12. Children Absent from Education and Attendance Concerns

In an online provision, attendance and engagement are important safeguarding indicators. A student who does not log in, repeatedly disconnects, stops submitting work or shows a marked change in their normal pattern may require safeguarding consideration as well as an attendance response.

- Lesson attendance and engagement information will be made available to commissioners through agreed reporting systems.
- Unexplained or persistent absence, particularly where it represents a change from the child's normal pattern, must be considered in context.
- Where absence creates a safeguarding concern, Apricot Online will contact the commissioning DSL or safeguarding contact and record the concern.
- If the normal commissioner route is unavailable and the risk requires action, the Apricot DSL may contact the relevant local authority or other statutory agency directly.
- Staff must not assume that because a child is receiving education at home they are necessarily safe or appropriately supervised.

13. Online Safety

Online safety is inseparable from safeguarding at Apricot Online. Staff and students should understand the four broad areas of online risk: content, contact, conduct and commerce. In addition, Apricot Online recognises risks arising from platform design, algorithms and rapidly developing technologies including generative artificial intelligence.

Risks may include harmful or illegal content, misinformation and disinformation, grooming, exploitation, cyberbullying, harassment, coercion, scams, self-harm or suicide content, pornography, radicalisation, online challenges, sharing of intimate images, AI-generated or manipulated sexual imagery, impersonation and deepfakes.

Apricot Online will use appropriate technical and operational controls, staff training, curriculum content and reporting processes to reduce online risk. Detailed requirements are contained in the Online Safety / E-Safety Policy.

14. Child-on-Child Abuse, Harassment and Violence

Children can abuse other children, including through online environments. The absence of reported incidents does not mean that abuse is not occurring.

Child-on-child abuse may include bullying, cyberbullying, physical abuse, sexual violence, sexual harassment, coercive behaviour, abuse within intimate relationships, upskirting, initiation/hazing behaviours, sharing or threatening to share intimate images, and abuse facilitated by technology.

Staff must never dismiss harmful sexual or abusive behaviour as banter, part of growing up or normal online behaviour. Concerns must be reported to the DSL and managed in a way that protects and supports all children involved.

15. Self-Generated Intimate Images, AI-Generated Images and Sexual Content

Staff must report any concern involving self-generated intimate images or videos, sexual imagery, AI-generated sexual imagery or deepfakes involving a child. Staff must not ask a child to forward, download or reproduce an intimate image and must not save such material to personal devices.

The DSL will assess the concern and seek appropriate specialist or statutory advice. Where an image may constitute illegal child sexual abuse material, staff must not investigate or circulate it.

16. Abuse, Neglect and Exploitation

All staff must understand the main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. Abuse may occur within or outside the home, be perpetrated by adults or children and may be facilitated through technology.

Staff must also be alert to exploitation, including child sexual exploitation and child criminal exploitation. Exploitation may appear consensual to a child but can still involve coercion, manipulation, deception or an imbalance of power.

17. Domestic Abuse

Children can be victims of domestic abuse where they see, hear or experience its effects, and may also experience abuse within their own intimate relationships. Online lessons may provide opportunities for staff to hear or become aware of concerning events within the home that would not be visible in a physical classroom.

Any concern that a child is affected by domestic abuse must be reported to the DSL.

18. Mental Health and Safeguarding

Mental health difficulties can, in some circumstances, be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff should be alert to significant changes in mood, communication, engagement, behaviour or attendance.

Apricot Online staff do not diagnose mental-health conditions. Where a mental-health concern is also a safeguarding concern, staff must follow safeguarding procedures immediately.

19. Child Criminal Exploitation, County Lines and Serious Violence

Staff must be alert to indicators including unexplained money or possessions, changes in friendships, older associates, unexplained injuries, increased absence, decline in engagement, fear, coercion, new online contacts or sudden changes in behaviour.

Concerns about criminal exploitation, county lines, trafficking or serious violence must be reported to the DSL, who will consider referral to the appropriate statutory agencies and the National Referral Mechanism where relevant.

20. Prevent, Radicalisation and Extremism

Apricot Online recognises the safeguarding risk posed by radicalisation and extremist influence, including through online content, communities and direct contact.

Staff must report concerns such as significant changes in behaviour, intolerance of others, advocacy of violence, sharing extremist material, concerning online activity or indications that a child is being targeted or influenced. The DSL will consider appropriate advice or referral, including Channel where relevant.

21. Honour-Based Abuse, FGM and Forced Marriage

So-called honour-based abuse includes practices such as female genital mutilation (FGM) and forced marriage. These are safeguarding and child-protection concerns and may constitute criminal offences. Where a teacher discovers that an act of FGM appears to have been carried out on a girl under 18, the statutory mandatory reporting duty to the police applies. Staff must also report the concern to the DSL in accordance with this policy.

Concerns relating to forced marriage or other honour-based abuse must be referred to the DSL without delay. Staff must not approach family members where doing so may increase risk.

22. Children with SEND and Additional Vulnerabilities

Many students accessing Apricot Online have SEND, health needs, anxiety or other additional vulnerabilities. Staff must recognise that these factors can increase safeguarding risk or create barriers to disclosure.

- Behaviour, communication or attendance changes must not automatically be attributed to a child's SEND or diagnosis.
- Staff should consider whether a child needs an alternative or supported way to communicate a concern.
- Online teaching can reduce some barriers but can also make visual signs of harm harder to identify.
- Children with limited communication, social isolation or dependence on adults may be especially vulnerable to abuse or exploitation.
- Safeguarding decisions should consider the child's individual communication needs and views.

23. Equality, Anti-Discriminatory Practice and the Child's Voice

Apricot Online is committed to safeguarding all children without discrimination. Staff must remain alert to the way racism, discrimination, disability, culture, language, sex, sexual orientation, gender-related issues, religion or belief and other factors may affect a child's experience, vulnerability, willingness to disclose or access to help.

The child's wishes and feelings should be sought and considered wherever it is safe and appropriate to do so. They must not be expected to carry responsibility for decisions that adults are required to make to protect them.

24. Allegations and Concerns About Adults

Any allegation that an adult working for or on behalf of Apricot Online has harmed a child, may have harmed a child, may pose a risk of harm, may have committed a relevant criminal offence or may be unsuitable to work with children must be reported immediately in accordance with the Managing Allegations Against Staff Members Policy.

Concerns about the Operations Director/DSL must be reported to the Managing Director. Advice will be sought from the relevant Local Authority Designated Officer (LADO) where the harm threshold may be met.

Staff must not investigate allegations themselves or alert the subject of an allegation unless instructed to do so.

25. Low-Level Concerns

A low-level concern is any concern, however small, that an adult working for or on behalf of Apricot Online may have acted in a way that is inconsistent with the Staff Code of Conduct but does not appear to meet the harm threshold.

Examples in an online environment may include inappropriate familiarity, private or personal communication with a student, use of unapproved platforms, inappropriate comments, boundary-blurring, unnecessary one-to-one contact outside agreed arrangements, sharing personal social-media details or recording a student interaction on a personal device.

All low-level concerns must be shared and recorded in accordance with Apricot Online procedures so that patterns can be identified and appropriate action taken.

26. Safer Recruitment

Apricot Online is committed to safer recruitment and to preventing unsuitable people from working with children. Recruitment and vetting arrangements are set out in the Safer Recruitment Policy and include appropriate identity, right-to-work, employment history, reference, qualification and DBS/barred-list checks according to role and legal requirements.

Apricot Online maintains an up-to-date Single Central Record and ensures relevant recruitment decisions and checks are documented.

27. Staff Training

All staff receive safeguarding information and training at induction and regular updates thereafter. Staff must read Part One of KCSIE 2026 in full. The DSL and DDSL undertake role-specific training and maintain their knowledge and skills in accordance with current guidance.

Training will reflect Apricot Online's online context, including recognising safeguarding indicators without physical proximity, professional boundaries, online harms, attendance and engagement patterns, recording concerns, information sharing and emergency escalation.

28. Curriculum and Teaching Students to Stay Safe

Apricot Online uses curriculum opportunities, including PSHE and relevant subject content, to help students understand healthy relationships, consent, respectful behaviour, online safety, exploitation, misinformation, harmful content, reporting routes and how to seek help.

Teaching will be age-appropriate, sensitive to individual needs and consistent with safeguarding responsibilities.

29. Security and Professional Boundaries

Staff and students must use their own authorised accounts and must not share passwords. Staff must use Apricot Online-approved systems for student communication and teaching. Personal social-media contact between staff and students is prohibited.

Unauthorised access, suspicious activity or security concerns must be reported promptly. Threatening, abusive or intimidating behaviour through Apricot systems or external channels connected to provision will be treated seriously and may be referred to police or other agencies. Guest speakers and external contributors will be subject to appropriate checks, briefing, risk assessment and supervision according to the nature of the activity.

30. Complaints and Whistleblowing

Safeguarding concerns raised through a complaint will be considered under the safeguarding process where appropriate and will not be delayed solely because a complaint is being investigated.

Staff who are concerned about safeguarding practice within Apricot Online should raise the matter with the DSL, DDSL or senior leadership. Where they believe concerns cannot be raised internally or are not being addressed appropriately, they should use Apricot Online's Whistleblowing Policy and relevant external whistleblowing routes.

31. Review, Quality Assurance and Learning

Safeguarding arrangements will be reviewed regularly and this policy will be reviewed at least annually. Safeguarding supervision, case review, low-level concerns, allegations, attendance patterns, complaints, online incidents and other relevant information may be used to identify themes and improve practice.

Where a safeguarding incident identifies a weakness in systems, training, technology, communication or procedure, Apricot Online will take corrective action and monitor its implementation.

Appendix 1 - Staff Quick Response: Concern or Disclosure

- Stay calm and listen.
- Take the child seriously.
- Do not promise confidentiality.
- Do not investigate or ask leading questions.
- If immediate danger exists, contact the DSL urgently and call emergency services where required.
- Record the concern promptly and factually, using the child's own words where possible.
- Submit the safeguarding record and alert the DSL/DDSL without delay.
- Preserve relevant online evidence without downloading, copying or circulating illegal or intimate material.
- Continue to support the child appropriately and maintain confidentiality.
- Escalate if you remain concerned that appropriate action has not been taken.

Appendix 2 - Indicators Particularly Relevant to an Online Setting

Physical signs may be difficult or impossible to observe where students do not use cameras. Staff should therefore consider patterns and changes across multiple sources of information.

- unexplained or persistent absence from live lessons;
- a sudden reduction in engagement, communication or submitted work;
- distress, fearfulness, withdrawal, aggression or unusually subdued behaviour;
- changes in the way a student writes, speaks or interacts online;
- another person appearing to control, prompt or monitor the student's communication;
- concerning background sounds, arguments, threats or comments heard during a live lesson;
- a student repeatedly being prevented from speaking privately or leaving a session suddenly;
- references to hunger, lack of heating, unsafe home conditions, being left alone or inadequate care;
- sexualised comments or behaviour inappropriate to age or development;
- unexplained gifts, money, new contacts or older associates;
- references to self-harm, suicide, abuse, exploitation, coercion, violence or criminal activity;
- sharing or threatened sharing of intimate images, including manipulated or AI-generated imagery;
- extremist, hateful or violent material or significant changes in expressed beliefs;
- repeated attempts by a third party to enter or interfere with a lesson;
- online bullying, harassment, stalking, impersonation or threats; and
- any combination of small concerns which, when viewed together, creates a safeguarding 'jigsaw'.

Appendix 3 - Specific Safeguarding Issues

Staff safeguarding training and KCSIE 2026 provide fuller guidance. The following issues must always be treated seriously and referred to the DSL where there is a concern:

- physical, emotional and sexual abuse and neglect;
- child-on-child abuse, sexual harassment and sexual violence;
- domestic abuse and teenage relationship abuse;
- child sexual exploitation and child criminal exploitation;
- county lines, trafficking, modern slavery and serious violence;
- online grooming, harmful content and technology-facilitated abuse;
- self-generated intimate images, AI-generated sexual imagery and deepfakes;
- bullying and cyberbullying;
- radicalisation and extremism;
- female genital mutilation, forced marriage and other honour-based abuse;
- children absent from or missing education;
- mental-health concerns where there is a safeguarding dimension;
- fabricated or induced illness;
- homelessness and unsafe living arrangements;
- substance misuse;
- racism, discriminatory abuse and hate-related harm; and
- any other circumstance in which a child may need help or protection.

Appendix 4 - Safeguarding Contact and Escalation Route

Internal safeguarding contacts must be used in the following order where available:

Jodie Phillips - Operations Director / Designated Safeguarding Lead

Amy Smith - Managing Director / Deputy Designated Safeguarding Lead

Where the concern is about the DSL, contact the Managing Director directly.

For students commissioned by a school or local authority, the relevant commissioning DSL/safeguarding contact should also be informed promptly. Where a child is at immediate risk, or an appropriate safeguarding contact cannot be reached, Apricot Online will not delay necessary referral to children's social care, police or emergency services.

Authorised by: Jodie Phillips, Operations Director

Date: October 2026

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