

Safeguarding & Child Protection Policy

September 2026

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1. Introduction

- 1.1. Safeguarding and promoting the welfare of children is everyone's responsibility. Horsham Learning Alliance (HLA) is committed to a child-centred, coordinated and whole-trust approach in which the best interests of the child are paramount, concerns are acted on promptly, and all settings maintain the attitude that "it could happen here".
- 1.2. This policy provides a single trust framework for the College and Schools. It establishes common principles, governance, minimum standards and core procedures while recognising that each setting retains a named Designated Safeguarding Lead (DSL), setting-specific reporting routes and operational arrangements appropriate to its age range, context and organisation.
- 1.3. The Trust Board holds ultimate statutory and legal responsibility for safeguarding across the Trust. Local Governing Bodies (LGBs) monitor implementation in their setting under the HLA Scheme of Delegation, through the Safeguarding Linked Governors providing regular dialogue with the nominated HLA Safeguarding Trustee.

2. Aims

The purpose of this document is to provide a summary of the shared aspects of safeguarding and child protection that are common across the College and Schools within the Trust. This includes legislation and statutory guidance, roles and responsibilities, confidentiality, recognising and responding to different types of abuse, referral processes, complaints, record keeping, training, safer recruitment, managing allegations and specific safeguarding issues. The overall aims are to:

- Protect children from abuse, neglect, exploitation and other harm.
- Provide a clear, consistent and child-centred safeguarding framework.
- Ensure concerns are recognised, recorded, shared and acted on without delay.
- Promote early help, effective multi-agency working and appropriate information sharing.
- Maintain safer recruitment, safe working practice and an open culture in which concerns about adults are reported.
- Secure effective governance oversight, assurance, challenge and continuous improvement.
- Ensure that safeguarding practice is inclusive and responsive to the lived experience, voice, communication needs and vulnerabilities of each child and young person.

3. Objectives

The Trust will uphold the highest possible standards to ensure that all children are safe, protected from harm, and able to achieve the best possible outcomes. In practice this means:

- The welfare and best interests of the child are paramount.
- Safeguarding is everyone's responsibility and no concern is too small to share.
- Children will be listened to, taken seriously and supported to participate in decisions affecting them.
- Professional curiosity will be maintained and assumptions will be tested.
- All staff will act immediately on concerns and will not wait for proof.
- Data protection is not a barrier to proportionate information sharing for safeguarding purposes.
- Parents and carers will normally be involved unless doing so would increase risk, prejudice an investigation or be contrary to professional advice.
- Practice will take account of contextual safeguarding, harm outside the home and online risk.
- Safeguarding arrangements will be equitable, anti-discriminatory and sensitive to SEND, communication, health, care experience, culture and other factors affecting access to help.

4. Legislative Framework

4.1. This policy has regard to current legislation, statutory guidance and local safeguarding arrangements, including:

- Keeping Children Safe in Education 2026 (KCSIE), including the role of the DSL and the expectations for governing bodies, proprietors and all staff.
- Working Together to Safeguard Children 2023.
- The Children Acts 1989 and 2004 and section 175 of the Education Act 2002.
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance.
- The Human Rights Act 1998, Equality Act 2010, Data Protection Act 2018 and UK GDPR.
- Current DfE information-sharing advice, safer recruitment guidance and online safety standards.
- West Sussex Safeguarding Children Partnership (WSSCP) procedures, thresholds and escalation arrangements.
- The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students.
- HLA Articles of Association, Scheme of Delegation and Terms of Reference.

4.2. Where legislation, statutory guidance or local procedures change during the life of this policy, the Trust and its settings will apply the current requirements and update the policy as soon as practicable.

5. Scope

5.1. This policy applies to all HLA Trustees, Governors, employees, agency and supply staff, volunteers, contractors, trainees, visitors and any other adult working for or on behalf of the Trust or either setting. It applies to safeguarding concerns arising on

site, off site, during educational visits, placements and transport, through remote or online activity, and in the wider community.

- 5.2. “Child” means any person under the age of 18. In Post-16, the policy also informs arrangements for adult learners and adults at risk who receive College services, with concerns managed through the appropriate adult safeguarding pathway where applicable.
- 5.3. Each setting must maintain accessible local guidance that identifies its DSL team, reporting system, emergency arrangements, key contacts and any procedures that differ because of phase or context. The local schedules form part of this policy and must not reduce the Trust-wide minimum standard.

6. Definitions

Term	Meaning
Safeguarding and promoting welfare	Providing help and support as soon as problems emerge; protecting children from maltreatment within or outside the home, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and enabling the best outcomes.
Child protection	The part of safeguarding concerned with children who have suffered, or are likely to suffer, significant harm.
Staff	All people working for or on behalf of the Trust or one of its settings, paid or unpaid, permanent or temporary.
Parent/Carer	A birth parent or any adult in a parenting role, including adoptive parents, step-parents, guardians and foster carers.
Abuse, neglect and exploitation	Forms of maltreatment or harm, including physical, emotional and sexual abuse, neglect, child-on-child abuse, domestic abuse and exploitation.
Low-level concern	Any concern, no matter how small, that an adult working in or on behalf of a setting may have acted in a way inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold.

7. Responsibilities

7.1. The Trust Board

- Holds strategic and statutory responsibility for safeguarding across the Trust and ensures compliance with legal duties and statutory guidance.
- Approves this policy and assures itself that effective safeguarding arrangements are implemented in each setting.
- Promotes a whole-trust approach encompassing curriculum, pastoral support, attendance, behaviour, online safety, safer recruitment and staff conduct.
- Ensures each setting appoints a trained DSL from the senior leadership team and suitable deputies.
- Ensures appropriate checks, safer recruitment systems, induction and ongoing training are in place for staff, supply staff, volunteers and contractors.

- Receives assurance through the Safeguarding Trustee, reporting through local governance, audits, safeguarding metrics and significant-incident escalation.

7.2. The Safeguarding Trustee

- Maintains Board focus on safeguarding and supports a strong culture across the Trust.
- Understands safeguarding requirements, including Prevent, providing informed challenge to the Executive.
- Reviews key safeguarding metrics such as attendance and exclusion.
- Reports to the Board on the effectiveness of safeguarding practice such as staff recruitment, induction and training.
- Serves as the Board's point of contact with the Safeguarding Link Governors and DSLs, reporting back to the Board on the effectiveness of the Trust's safeguarding practice.

7.3. The Local Governing Bodies (LGBs) and Safeguarding Link Governors

- Fosters a local culture that prioritises safety and wellbeing and monitor implementation of this Trust policy.
- Appoints a Safeguarding Link Governor with sufficient time, training and access to discharge the role.
- Ensure the Link Governor meets the DSL at least termly, reviews actions and relevant data, and provides a written report to the LGB and Trust.
- Seeks assurance that the Single Central Register is checked at least termly and remains compliant and up to date. The Link Governor is not required to inspect the register directly.
- Monitors the effectiveness of online safety including local filtering and monitoring arrangements, reporting systems, audits and agreed improvement actions.
- Escalates significant matters through the LGB Chair to the Trust Board and preserves confidentiality.

7.4. The Executive and setting leaders

- Implements this policy and provide sufficient resources, authority, time and cover for DSL functions.
- Ensures safer recruitment, staff induction, annual training, regular updates and an effective Staff Code of Conduct.
- Ensures allegations and low-level concerns about adults are managed under KCSIE, local LADO arrangements and HLA procedures.
- Provides coordinated early help and work effectively with social care, police, health and other agencies.
- Remedies safeguarding weaknesses without delay and ensure lessons from concerns, audits and incidents are embedded.

7.5. The Designated Safeguarding Leads (DSLs)

- The DSL in each setting has lead operational responsibility and must be given the status, authority, time, training, funding and resources needed to fulfil the

role. Deputies are trained to the same standard and may carry out delegated activities, but ultimate lead responsibility remains with the DSL.

- Manage referrals to Children's Social Care, police, the Channel programme, Disclosure and Barring Service and other bodies as required.
- Provide advice and support to staff, maintain safeguarding records, and ensure decisions and reasons are recorded.
- Work with leaders and Governors to promote educational outcomes for children who have experienced or are experiencing safeguarding concerns.
- Ensure child protection files are secure, separate from the main education record and transferred promptly and securely when a child moves setting.
- Understand local thresholds, referral routes, escalation procedures and support services.
- Ensure children's views are heard and that communication needs and barriers to disclosure are addressed.
- Lead or contribute to training, policy review, online safety, filtering and monitoring review, audit and quality assurance.

7.6. All staff and volunteers

- Read KCSIE Part One in full, this policy, the setting Staff Code of Conduct and local reporting guidance (Trustees, Local Governors and leaders are required to read KCSiE in full).
- Know the DSL and deputies and how to contact them.
- Complete induction and required safeguarding updates.
- Recognise indicators of abuse, neglect and exploitation and remain alert to children who may benefit from early help.
- Act immediately, record factually and report concerns without delay.
- Never promise confidentiality, investigate a concern or ask leading questions.
- Refer directly to Children's Social Care or police if necessary when a child is at immediate risk or the DSL team is unavailable.
- Reports any concern about an adult's conduct through the setting's allegations or low-level concern route.

8. Core Safeguarding Procedures

8.1. If a child is in immediate danger

Immediate action

Call 999 where there is an immediate risk to life or urgent danger. Obtain urgent medical help where required. Inform the DSL as soon as possible and record the action taken.

8.2. Responding to a disclosure or concern

- Listen carefully, remain calm and take the child seriously.
- Reassure the child that they have done the right thing by speaking and that the information will be shared only with people who need to help keep them safe.
- Do not promise secrecy, investigate, confront anyone, ask leading questions or require the child to repeat the account unnecessarily.

- Record promptly and factually: date, time, place, people present, observations, injuries, the child's words, action taken and any relevant context.
- Report to the DSL or deputy immediately using the setting's reporting system. An urgent concern must also be raised directly in person or by telephone.
- Retain and pass on any original contemporaneous notes. Do not photograph injuries on a personal device or ask a child to remove clothing.
- If the DSL team cannot be reached and delay may place a child at risk, contact Children's Social Care and, where appropriate, police directly.

8.3. DSL decision-making and referral

- Assess risk and need promptly, considering the child's wishes, lived experience, family context, online and extra-familial harm and any cumulative pattern.
- Consider early help where needs can be addressed before the threshold for statutory intervention is reached.
- Refer to West Sussex Children's Social Care where there is reasonable cause to suspect significant harm, or where the threshold is uncertain and advice is needed.
- Contact police where a crime may have been committed or urgent protection is required, using current NSPCC guidance.
- Normally inform parents/carers before referral unless this may increase risk, prejudice an investigation, cause delay or be contrary to advice from social care or police.
- Record the concern, assessment, action, rationale, outcome and follow-up. Escalate if the setting remains concerned about an agency response.

8.4. Mandatory and specific reporting

- Known cases of female genital mutilation disclosed to a teacher must be reported by that teacher directly to police in accordance with the mandatory reporting duty; the DSL must also be informed.
- Other specific safeguarding concerns, including Prevent, forced marriage, child criminal or sexual exploitation and serious online harm, must be managed through current statutory and local procedures.

9. Children who may be more vulnerable

- 9.1. All children can experience harm. Staff must be particularly alert where barriers to recognition or disclosure may exist, including SEND or communication needs, care experience, mental or physical health needs, young caring responsibilities, homelessness, family substance misuse or domestic abuse, absence from education, exclusion or alternative provision, exploitation, discrimination, or risk outside the home.
- 9.2. The presence of vulnerability must never lead staff to assume that a change in behaviour, attendance, presentation or communication is explained by a diagnosis or circumstance. The child's voice and preferred communication method must be actively considered.

10. Child-on-child abuse

10.1. The Trust recognises that children can abuse other children and that this can occur inside or outside a setting and online. Abuse will not be dismissed as banter, part of growing up or an inevitable feature of relationships. A zero-tolerance approach means concerns are acted on, while responses remain proportionate, child-centred and informed by risk and need. Child-on child abuse may include:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between children.
- Physical abuse and threats of harm, including use of a weapon.
- Sexual violence, sexual harassment, misogyny and harmful sexual behaviour.
- Consensual or non-consensual sharing of self-generated intimate images, including AI-generated or manipulated images.
- Upskirting, coercion into sexual activity, initiation or hazing and exploitation.

10.2. Response

- Take all reports seriously and prioritise immediate safety, medical needs and preservation of evidence.
- Inform the DSL without delay. The DSL will complete and record an immediate risk and needs assessment covering the child who has reported, the alleged child responsible and other children potentially affected.
- Consider wishes, age, development, power imbalance, SEND, previous incidents, ongoing risk, online elements and wider context.
- Choose the appropriate route: internal safeguarding support, early help, Children's Social Care and/or police.
- Provide appropriate support and safety planning to all affected children without allowing disciplinary action to replace safeguarding support.
- Keep arrangements, including separation where needed, under review and minimise disruption to education.

11. Concerns or Allegations About Adults

11.1. Any concern that an adult working for or on behalf of HLA may have harmed a child, committed a relevant offence, posed a risk of harm, or behaved in a way indicating they may not be suitable to work with children must be reported immediately to the setting Executive Principal or Headteacher, who will consider whether an onward referral to the LADO is required. Where there is a concern/allegation about the setting Headteacher, this should be referred to the CEO or if in regard to the Executive Principal/CEO the HLA Chair of Trustees (who must consider an onward referral to the LADO) or directly to the LADO. No internal investigation will begin before the LADO has been consulted in cases where the harm threshold may be met. The setting will work with the LADO, police, social care, HR and the employer of any supply worker as required. It will consider immediate risk management,

support for the child and adult, confidentiality, suspension only where appropriate, record keeping, referrals and lessons learned.

11.2. Low-level concerns

All low-level concerns must be reported according to the setting's published procedures and recorded in writing. They will be reviewed to identify patterns, address inappropriate behaviour early and identify weaknesses in safeguarding arrangements. If there is doubt about whether the harm threshold is met, LADO advice will be sought.

11.3 Whistleblowing

Staff must refer to Trust whistleblowing arrangements where they believe safeguarding concerns are not being handled properly or cannot be raised through normal routes. Staff may also use the NSPCC Whistleblowing Advice Line or contact relevant statutory agencies.

12. Safer Recruitment and Ongoing Suitability

12.1. HLA settings will follow KCSIE safer recruitment requirements and maintain a compliant Single Central Register.

12.2. At least one appropriately trained person will participate in relevant recruitment processes.

12.3. All required identity, right-to-work, barred-list, DBS, prohibition, qualification, overseas and other checks will be completed and recorded as applicable to the role.

12.4. Shortlisted candidates will be informed that online searches may be undertaken as part of due diligence.

12.5. Induction will include safeguarding, child protection, Staff Code of Conduct, reporting routes, whistleblowing, online safety and Prevent.

12.6. Ongoing suitability concerns, including transferable risk arising outside work, will be considered through the appropriate allegations, disciplinary and referral procedures.

13. Attendance and Children Absent from Education

13.1. Attendance is a safeguarding matter. Persistent or unexplained absence, repeated lateness and changes in attendance patterns may indicate neglect, exploitation, mental health difficulty, criminal involvement or other harm.

13.2. Each setting will monitor attendance, make timely enquiries, share relevant information with the DSL and local authority, and follow its attendance and children-missing-education procedures. Children with a social worker or safeguarding plan require particular vigilance and prompt follow-up.

14. Online Safety, Filtering, Monitoring and AI

14.1. Online safety is an integral part of safeguarding, curriculum, staff training, behaviour expectations and parental engagement. HLA settings will address the four broad areas of risk: content, contact, conduct and commerce, and will:

- Maintain appropriate filtering and monitoring systems and review their effectiveness at least annually and following significant change or concern.
- Assign clear leadership, technical and governance responsibilities and ensure staff understand what is monitored and how to report concerns.
- Provide age-appropriate education covering harmful content, relationships, privacy, image sharing, misinformation, scams and safe use of AI.
- Manage AI-related risks including deepfakes, manipulated intimate images, harmful outputs, data protection and circumvention of controls.
- Apply setting-specific mobile device rules. The Forest School is a phone-free environment during the school day; Collyer's permits responsible use subject to its Behaviour Policy, learner Code of Conduct and staff direction.
- Refer online safeguarding concerns promptly to the DSL and preserve potential evidence without viewing, copying or forwarding illegal material unnecessarily.

15. The Prevent Duty

- 15.1. The Trust and its settings will have due regard to the need to prevent people from being drawn into terrorism. Prevent is part of safeguarding and concerns will be handled proportionately through normal safeguarding routes. The Trust will:
- Maintain setting-level risk assessments and action plans informed by local context.
 - Ensure DSLs understand local Prevent referral pathways and the voluntary, multi-agency Channel process.
 - Provide role-appropriate staff training and updates.
 - Build resilience through curriculum, respectful discussion, critical thinking and online safety.
 - Work in partnership and ensure IT policies and filtering arrangements respond to extremist content and online radicalisation.

16. Information Sharing, Confidentiality and Records

- 16.1. Information will be shared lawfully, proportionately, accurately, securely and on a need-to-know basis to protect children.
- 16.2. Staff must not promise confidentiality.
- 16.3. Consent is not required where sharing is necessary to safeguard a child, although children and parents/carers should normally be informed when safe and appropriate.
- 16.4. Each setting will use its approved secure safeguarding case-management system. Concerns must be recorded on the same day and urgent concerns raised directly.
- 16.5. Records must distinguish fact, observation, professional judgement and third-party information and show actions, decisions, reasons and outcomes.
- 16.6. Child protection files must be held securely, separately from the main education record, retained in line with policy and transferred securely and promptly when a child moves setting.
- 16.7. Cross-setting information sharing within HLA will take place only where necessary for safeguarding, transition, continuity of support or statutory assurance.

17. Training and Safeguarding Culture

- 17.1. All staff and volunteers receive safeguarding induction before or at the start of duties and updates at least annually, with additional briefings as risks or guidance change.
- 17.2. DSLs and deputies complete role-specific training at least every two years and refresh knowledge and skills regularly.
- 17.3. Trustees and Local Governors complete safeguarding training on induction and annual refresher training; those involved in recruitment have access to safer recruitment training.
- 17.4. The HLA Safeguarding Network meets termly, arranged by the Director of Governance, bringing together DSLs, Safeguarding Link Governors and the Safeguarding Trustee to share updates, practice and assurance.
- 17.5. The Trust will promote a culture in which children can identify trusted adults, staff can raise concerns without fear, and learning from incidents and audits leads to improvement.

18. Monitoring, Assurance and Reporting

- 18.1. Safeguarding assurance will combine local ownership with Trust oversight. It will include:
 - Termly DSL and Safeguarding Link Governor meetings and written visit reports to the LGB, shared with the Trust and reviewed by the Safeguarding Trustee.
 - Participation in the West Sussex safeguarding audit cycle, with the DSL and Link Governor collaborating on completion and improvement planning.
 - Termly review of relevant qualitative and quantitative information, including referrals, themes, training, attendance, exclusions, child-on-child abuse, online safety, low-level concerns and action plans, presented in a way that protects confidentiality.
 - Assurance that the Single Central Register has been checked at least termly and that filtering and monitoring systems are effective.
 - Prompt reporting of significant safeguarding matters through the agreed escalation route. Matters of sufficient seriousness must be reported to the Chair of Trustees as soon as reasonably practicable, including serious incidents and serious allegations involving suspension or dismissal.
 - Annual review of this policy and earlier review after material changes to law, statutory guidance, local procedures, Trust structure or identified practice.

19. Related Documentation

- 19.1. This policy links to the following Trust policies and procedures:
 - Health & Safety Policy
 - Whistleblowing Policy
 - Data Protection Policies
 - Staff Disciplinary Policy
 - Staff Code of Conduct

19.2. This policy links to the following setting specific policies, procedures and guidance, including:

- Education for safeguarding
- Supporting gender questioning young people
- Spotting signs of abuse
- Dealing with disclosures
- Reporting and recording
- Risk assessment and external referral
- Managing allegations and low-level concerns
- Managing child-on-child abuse, sexual harassment and violence
- Online Safety: filtering and monitoring arrangements/use of mobiles/AI
- Prevent
- Safeguarding Training Schedule
- Attendance/Children Missing Education
- Behaviour
- Exclusions/Suspensions
- SEND
- AI/Online Safety/Acceptable Use of Computers
- Educational Visits
- Alternative Provision
- Intimate Care

Annex A: Safeguarding Arrangements

This information must be checked and updated whenever named personnel or contact routes change. Operational changes may be approved administratively without reopening the whole policy, provided the Trust-wide standard is not reduced.

Setting	The College of Richard Collyer	The Forest School
Head of setting	Executive Principal: Dan Lodge	Headteacher: Ian Straw
DSL	Andrea John (Vice Principal - Pastoral)	Mark England (Senior Assistant Headteacher)
Deputy DSL(s)	Greg Friend (Director Student Support) Helen Bolger (Head of Wellbeing) Nicola Algar (Student Services Manager) Lauren Ashby (Student Services Officer) Mel Lusher-Dulieu (Student Services Officer) Lindy Nicholls (Student Services Officer)	Anne Dodge Dom Giacomelli Liz Kirkland Danielle Musselwhite
Internal reporting	CPOMS Urgent concerns to Safeguarding Team email: safe@collyers.ac.uk	CPOMS Urgent concerns to DSL or deputies
Local Governing Body Safeguarding link	Lauren Smith SafeguardingGov@collyers.ac.uk	Hannah Stevenson hstevenson@theforestschool.net
Safeguarding Trustee	Vinny Wagjiani: governance@hla.education	
Allegations about staff	Report to Executive Principal	Report to Headteacher
Allegations about setting leader	Chair of HLA Board of Trustees or LADO	CEO or LADO
Mobile devices	Permitted subject to responsible use and behaviour requirements	Phone-free during the school day unless specific permission is given

Annex B: Recognise, Respond, Record and Report

Recognise

Notice signs, changes, disclosures, online concerns, attendance patterns, injuries, behaviour or information from others. Maintain professional curiosity.

Respond

Listen, stay calm, take the child seriously, do not promise secrecy, do not investigate or ask leading questions, and secure immediate safety or medical help.

Record

Write a factual, timely account using the child's words where possible. Include date, time, place, people present, observations, action, decisions and outcome. Retain original notes.

Report

Contact the DSL or deputy immediately and use CPOMS. Raise urgent concerns directly as well as recording them. If no DSL is available and delay creates risk, contact Children's Social Care or police.

Staff must not delay reporting while seeking further information or discussing the matter with colleagues who do not need to know.

Annex C: Types and Indicators of Abuse

Physical abuse

May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, including fabricated or induced illness.

Emotional abuse

Persistent emotional maltreatment causing severe and adverse effects on emotional development, including humiliation, silencing, inappropriate expectations, serious bullying and exposure to ill-treatment.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, contact or non-contact, whether or not the child understands what is happening, including grooming, image-related abuse and online activity.

Neglect

Persistent failure to meet basic physical or psychological needs, including food, clothing, shelter, supervision, protection, medical care and emotional responsiveness.

Exploitation and harm outside the home

Includes child sexual exploitation, child criminal exploitation, county lines, trafficking, serious youth violence, coercion and risks arising in peer groups, public spaces or online.

Domestic abuse

Children may experience domestic abuse directly or through seeing, hearing or experiencing its effects; this can have a serious and lasting impact.

Act on the concern

Indicators do not prove abuse and absence of indicators does not rule it out. Staff do not diagnose or investigate. They record and report concerns to the DSL.

Annex D: Key External Contacts

Service	Contact	Purpose
West Sussex Integrated Front Door	01403 229900	Children's Social Care referrals and urgent advice
Police	999 emergency; 101 non-emergency	Immediate danger or suspected crime
West Sussex LADO	West Sussex online LADO referral portal	Allegations about adults working with children
Safeguarding in Education Team	0330 222 4030; Safeguarding.education@westsussex.gov.uk	Education safeguarding advice
NSPCC Whistleblowing Advice Line	0800 028 0285	External advice where safeguarding practice cannot be raised internally

Settings must verify contact details against current West Sussex and national information and update this schedule promptly if details change.