

Safeguarding and Child Protection Policy

Nationwide Energy Training Services | Trading as Impact Academy

Adult apprenticeships and child protection responsibilities

Document control	Record
Version	FINAL VERSION 20 September 2026
Accountable approver	Debbie Ryan, Chief Operating Officer
Policy owner	Paul Conroy, Designated Safeguarding Lead
Deputy safeguarding lead	Jane Diloranzo
Approval record	Controlled policy register
Next full review	By 16 September 2027, or earlier when circumstances require

We safeguard learners in online, workplace and face-to-face learning. We listen, act promptly on concerns, protect people from further harm and follow through until risks and support needs are addressed. Our current provision is adult-only with no subcontracted delivery. The adult safeguarding procedure is in section 9.11; child protection applies whenever a child is involved, including a learner's children.

Immediate danger: call 999. Report other safeguarding concerns immediately to the DSL or deputy and confirm receipt. Do not wait to complete a form. For allegations about Paul Conroy or Debbie Ryan, contact Paul Ryder directly. If an internal route is unavailable, conflicted or ineffective, contact the appropriate external service.

Important contacts

Role or route	Name and contact
Designated Safeguarding Lead	Paul Conroy 07855 868353 p.conroy@impactacademy.uk confidential@impactacademy.uk
Deputy DSL	Jane Dilorenzo 07305 072273 j.dilorenzo@impact-academy.org.uk
COO and IT lead	Debbie Ryan 07966 455050 d.ryan@impact-academy.org.uk
Independent allegations contact	Paul Ryder 07837 091812 pvr@talktalk.net
Emergency services	999 Police non-emergency 101
Warrington child safeguarding	01925 443322, option 1 then option 1 Professionals: warrington.gov.uk/mars
Warrington adult safeguarding	01925 443322 Professionals: online referral at warrington.gov.uk/report-adult-safeguarding-concern
Warrington out of hours	01925 444400 Children: also 01925 443322, option 2
Warrington LADO	01925 442079 lado@warrington.gov.uk
Prevent advice	0800 011 3764 National Prevent referral route to the relevant local police force

Use the local authority and police routes relevant to the person's location. Warrington contacts do not replace the correct local routes for nationwide learners. The DSL keeps a checked referral directory and documents cross-boundary arrangements. The confidential mailbox is not an emergency service; urgent concerns require a telephone call and confirmed handover.

Finding the right procedure

- Immediate action and disclosure: sections 9.1 and 9.2; Appendix C
- Adult safeguarding, wishes and capacity: section 9.11
- Employer and workplace responsibilities: section 7.1
- Information sharing and confidentiality: section 8
- Allegations and independent escalation: sections 9.8 and 13
- Online safety: section 10
- Recruitment and training: sections 12 and 15
- Case records and follow-up: section 14
- Board oversight and policy control: section 16
- Required supporting documents: section 17
- Indicators of harm: Appendices A and B
- Official references: Appendix D
- Minimum concern record: Appendix E

1 Aims

Impact Academy aims to safeguard and promote the welfare of all learners and apprentices, including adults with care and support needs and any children connected with our provision.

We act promptly on welfare concerns, listen to the person at risk, take proportionate action and work with appropriate partner agencies. For children, their welfare is paramount. For adults, we respect autonomy, wishes and decision-making capacity while taking action to prevent abuse, neglect and exploitation.

We require staff, governors, volunteers, contractors, employers and third-party partners to understand their safeguarding responsibilities and know how to recognise, report and escalate concerns. Learner safety takes priority over recruitment, retention, commercial relationships and performance targets.

2 Scope

This policy applies to all staff, governors, volunteers, contractors, agency staff, associates, employers, workplace mentors, work-placement partners and any third party delivering services on behalf of Impact Academy. Employer responsibilities are secured through our agreements, briefings and monitoring; Impact Academy retains oversight of the safeguarding of its learners.

It applies to all safeguarding activity connected to the organisation, including face-to-face delivery, remote delivery, off-site activity, workplace learning, work experience, trips, events, transport arranged by the provider and use of digital systems.

The adult safeguarding procedure in section 9.11 applies to our current adult provision. A learner does not automatically become an adult at risk because they are an apprentice, have a disability or need learning support. Before enrolling anyone under 18, the DSL and Debbie Ryan must review staffing, safer recruitment, local referral arrangements, parental involvement, attendance and digital safeguards against KCSIE 2026. The child-protection parts of this policy must then be implemented in full.

Our current provision is adult-only and we do not subcontract delivery. Before either position changes, Debbie Ryan and the DSL must authorise a documented readiness review, complete all applicable safeguarding checks and brief those affected. No under-18 learner or new delivery partner may start before the required

safeguards are in place. This policy governs provision in England; any proposed delivery elsewhere requires a review of the relevant national law and referral arrangements before it starts.

3 Legislation and guidance

This policy follows the legislation and guidance below in England. KCSIE applies to independent training providers' responsibilities towards children receiving education or training. It is not a substitute for the Care Act adult safeguarding framework. We apply proportionate safeguarding arrangements to learners of every age.

- Keeping Children Safe in Education 2026, in force from 1 September 2026, including full Part one, Parts two to five and Annex B on the DSL role.
- Working Together to Safeguard Children 2026.
- DfE statutory information-sharing guidance, including the section 16LA Children Act 2004 duty from its commencement on 30 September 2026. Duties must be applied according to their scope and commencement, alongside existing lawful safeguarding information sharing.
- Prevent duty guidance for England and Wales 2023, in force from 31 December 2023, and current DfE guidance for education and work-based learners.
- DfE filtering and monitoring core standard, including 2026 updates on generative AI; Ofsted further education and skills inspection toolkit for September 2026.
- Children Act 1989 and Children Act 2004.
- Children and Social Work Act 2017.
- Counter-Terrorism and Security Act 2015.
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015.
- Safeguarding Vulnerable Groups Act 2006.
- Rehabilitation of Offenders Act 1974.
- Data Protection Act 2018, UK GDPR and applicable provisions of the Data (Use and Access) Act 2025.
- Human Rights Act 1998 and Equality Act 2010.
- Care Act 2014 and Care and Support Statutory Guidance chapter 14; Mental Capacity Act 2005.
- DBS eligibility and referral guidance, including the September 2026 changes to regulated activity with children. The Education and Training (Welfare of Children) Act 2021 and relevant funding agreement requirements apply to child-related provision. Sources are listed in Appendix D.

4 Definitions

Safeguarding children includes providing help as needs emerge; protecting children from abuse, neglect and exploitation, including online; preventing harm to mental and physical health or development; ensuring safe and effective care; and promoting the best outcomes. Safeguarding adults means supporting their right to live safely, free from abuse and neglect, while recognising their wellbeing, views and wishes.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

A child is anyone under the age of 18.

Child-on-child abuse includes harassment and violence: bullying, discriminatory abuse, abuse in intimate relationships, physical violence or threats involving weapons, harmful sexual behaviour, sexual harassment or violence, coercion, making or sharing nudes or semi-nudes including AI-generated images, upskirting and

hazing. It may happen online or offline. Abuse between adults is also addressed under this policy and the adult safeguarding and police routes.

Low-level concern means any concern, no matter how small, that an adult working in or on behalf of the organisation may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside work, but which does not meet the harm threshold.

5 Equality, inclusion and vulnerability

Learners may face additional barriers to recognising abuse, reporting it or being believed. We will not attribute signs of abuse automatically to disability, behaviour, culture or mental ill-health, and will challenge racism, misogyny, misandry and other prejudice-based abuse.

Staff consider SEND, neurodiversity, physical and mental health, communication or language needs, caring responsibilities, poverty, housing insecurity, prior social-care involvement, exploitation and isolation. Provide accessible reporting methods, time and support to communicate, and an independent interpreter where needed. Do not use an alleged abuser as an interpreter or support person.

Being lesbian, gay, bisexual or transgender is not itself evidence of abuse or a reason for referral. Prevent and address discriminatory bullying and offer a trusted person to talk to. For an under-18 request relating to social transition, the DSL and senior leaders must follow the specific KCSIE 2026 guidance, assess individual welfare and equality duties, document decisions and involve parents or carers unless doing so would create a safeguarding risk. Staff must not make unilateral decisions or disclose sensitive information without this assessment. The child-specific process must not be applied automatically to adult learners.

A child expressing feelings about gender without asking the setting to make changes does not by itself justify breaking confidence. Staff use the normal safeguarding process if a related welfare or safety concern arises. Adults retain control over personal information subject to lawful safeguarding exceptions.

6 Roles and responsibilities

6.1 All staff

All staff must read this policy, the staff code of conduct and KCSIE 2026 Part one in full as Impact Academy's adopted training standard. The new overview is a quick reference, not a replacement for Part one. Induction and updates must explain which child-specific provisions apply to our adult-only context. Staff must know the DSL, deputy and independent board contact, how to report an adult or child concern, how to refer in an emergency, and how to escalate if action is not being taken. The person receiving a concern remains responsible for ensuring it reaches a safeguarding lead or external service. Staff must maintain professional curiosity, act immediately on concerns, record concerns promptly and accurately, and never assume that somebody else will take action.

6.2 Designated Safeguarding Lead

Paul Conroy is the DSL and leads safeguarding for adults and children, including online safety and Prevent. Jane Dilozenzo is deputy DSL and acts when Paul Conroy is unavailable. Debbie Ryan is the policy approver and overall IT and network lead; this does not replace the DSL's safeguarding case responsibilities.

The DSL supports staff, assesses and manages concerns, makes and follows up referrals to the appropriate adult or children's service, police, Prevent and LADO, maintains restricted records, assures training and reports themes to leaders and the board.

The DSL ensures that people affected by abuse, sexual harassment or violence receive support and that risk assessments protect all affected parties. Agency advice guides decisions about contact, learning arrangements and evidence preservation.

The DSL will oversee safeguarding arrangements for remote learning, work-based learning, third-party delivery and alternative or subcontracted provision where relevant.

6.3 Availability and cover

Paul Conroy or Jane Dilozenzo must be contactable during scheduled Academy learning, assessments, visits and learner support activity. Before absence or out-of-hours provision, Paul Conroy records who covers safeguarding, their contact route and handover of urgent cases, and communicates this to staff. Both must have access to necessary restricted records. Staff use the telephone for urgent concerns and confirm receipt; sending an email alone is not sufficient. Employer agreements must also set out the workplace reporting contact and emergency arrangements for working hours outside Academy cover. Staff, learners and employers must receive the actual cover hours and out-of-hours routes; nobody should rely on an unattended mailbox.

If neither is available, staff contact the relevant external service directly when delay could increase risk, then notify the available senior leader. Debbie Ryan coordinates cover but specialist decisions remain with a suitably trained safeguarding lead or external agency. If confidential@impactacademy.uk is used, Paul Conroy must ensure that access, monitoring hours, deputy cover and absence arrangements are documented and tested. It must not be presented as a continuously monitored emergency service.

6.4 IT and network oversight

Debbie Ryan owns IT and network security, approves digital systems and filtering exceptions, commissions technical support and retains test and review evidence. Paul Conroy assesses safeguarding risks and leads the response to safeguarding alerts; Jane Dilozenzo provides deputy cover. Technical support implements agreed controls, identifies limitations and escalates incidents. The board reviews effectiveness and outstanding risks. Technical administrators receive case information only where necessary.

6.5 Senior leaders and board members

Senior leaders and governors will ensure there is a whole-organisation approach to safeguarding and that safeguarding underpins policies, culture, decision-making, staffing and quality assurance. They will ensure the DSL has sufficient time, status, authority, training, resources and support to fulfil the role. They will ensure allegations and low-level concerns are handled appropriately, that safer recruitment arrangements are robust, and that filtering and monitoring arrangements are understood, reviewed and overseen. They will receive safeguarding training appropriate to their role and provide challenge and assurance around the effectiveness of safeguarding arrangements. The board must challenge overdue actions, resource shortfalls and any mismatch between the policy and practice. A serious control failure must be escalated immediately to Debbie Ryan and, where she is implicated, to Paul Ryder; it must not wait for a quarterly report.

7 Safeguarding culture and prevention

Impact Academy will create an environment in which learners feel safe, are listened to, can raise concerns privately and trust that action will be taken. Reporting routes are included in induction, Aptem learning information and employer briefings and are checked through learner conversations.

Safeguarding will be supported through induction, tutorial activity, employer engagement, online safety education, clear reporting routes, respectful behaviour expectations and effective partnership working.

We will not tolerate abuse, harassment, discriminatory language, sexual violence, sexual harassment, coercive behaviour or victim-blaming.

Learners may report to any trusted member of staff, the DSL or deputy, or an appropriate external service. Staff must offer private opportunities to discuss safety, including workplace relationships. Employer or manager approval is never required to report a concern or make a safeguarding referral. We explain the response and provide updates in a way that is safe and accessible for the learner.

7.1 Employers and workplace safeguarding

Before a learner starts workplace learning, the responsible Academy staff member must complete and retain a proportionate employer safeguarding assessment. It must identify the workplace contact and deputy, supervision arrangements, job and site risks, lone working, travel, working hours, bullying and harassment reporting, online access and any additional learner needs. The DSL reviews safeguarding risks and unresolved concerns before the placement is approved.

Employers must receive this policy or an accessible briefing, the DSL and deputy contact details, independent escalation arrangements, and the instruction to call 999 in an emergency. The Academy records the briefing, the named employer contact and their acknowledgement of reporting responsibilities. New managers and mentors must receive the same information when responsibilities change.

Employers must report safeguarding concerns affecting an apprentice to the DSL or deputy immediately and confirm receipt. They must preserve relevant evidence, cooperate with safeguarding enquiries, support agreed protective measures and alert the Academy to concerning absence or changes in workplace risk. They must not wait for a grievance or disciplinary process to conclude, investigate a disclosure in place of statutory agencies, or promise confidentiality.

Tutors check workplace safety privately with learners at induction and each planned progress review, and sooner if concerns arise. Where the employer or manager may be causing harm, staff use a safe route that bypasses them and do not alert the alleged perpetrator without DSL and, where relevant, agency advice. Only the information necessary to implement protective arrangements is shared with an employer.

The DSL and Debbie Ryan may suspend a placement, restrict contact or arrange an alternative learning arrangement where safety cannot be assured. Commercial pressure must not delay protection. The decision,

learner support, conditions for resuming activity and review date must be recorded. Employer arrangements are reviewed at least annually and following a concern, change of role, manager, site or working pattern.

7.2 Professional boundaries

Staff and those working on our behalf must use approved communication channels, maintain appropriate relationships and avoid favouritism, secrecy, personal financial arrangements and private social contact that creates a safeguarding risk. One-to-one sessions and visits must follow a recorded risk assessment with appropriate visibility and safe reporting routes. Boundary concerns are reported through section 13 even where no harm has yet been identified.

8 Confidentiality and information sharing

Timely, lawful information sharing is essential for adult and child safeguarding. Share relevant, accurate and proportionate information with people who need it, using secure channels. Explain what will be shared and why where it is safe to do so. Do not wait for certainty of abuse or allow confusion about data protection to delay urgent protection.

Record the purpose, recipient, lawful basis under UK GDPR Article 6 and any additional condition needed for special-category or criminal-offence data. Apply the Data Protection Act 2018 and applicable Data (Use and Access) Act 2025 provisions. Consent is not always the appropriate data-protection basis for safeguarding. Seeking a person's agreement to support and referrals is distinct from deciding the lawful basis for processing. Adult wishes, capacity, coercion and risks to others must be assessed as set out in section 9.11.

Never promise absolute secrecy. Explain that relevant information may need to be shared to protect the person or others. Do not routinely inform parents, employers or family about an adult's disclosure. For children, involve parents or carers unless this would increase risk or compromise safeguarding or police enquiries; seek agency advice where needed.

Employers are safeguarding partners, but are not automatically entitled to a learner's case file. The DSL agrees what an employer needs to know to protect the learner or others, checks the recipient's role and possible conflict, explains the sharing where safe, and records the lawful basis. A learner's employment status or an employer request does not override confidentiality. If an employer is implicated, seek appropriate agency advice before disclosure and use an alternative safe contact.

If staff are unsure whether to share information, they must seek advice from the DSL without delaying action where there is risk of harm.

Record both decisions to share and not to share, the reasons, what was shared, with whom and when. Distinguish observed facts, the person's words, professional opinion, historic concerns and current risk. Check recipients and access permissions; do not store case details in a general Ofsted evidence folder, ordinary employer-visible Aptom notes or an unapproved AI tool.

We comply with applicable statutory information-sharing duties when they are in force. From 30 September 2026, where section 16LA of the Children Act 2004 applies, relevant information must be shared for the recipient's safeguarding functions unless disclosure would be more detrimental to the child than non-disclosure. Any reliance on that limited exception must be reasoned, recorded and reviewed. Existing lawful safeguarding sharing must continue without waiting for commencement.

9 Recognising abuse and taking action

9.1 Immediate danger or serious harm

Anyone may contact the relevant adult or children's social care service or police directly. Internal permission is not needed where delay risks harm. Call 999 for immediate danger or a life-threatening medical or mental-health emergency. For remote learning, establish the person's current location and give emergency services the address and known risk. Stay connected where safe and follow their instructions. If a member of staff makes a referral directly, they must inform the DSL as soon as possible.

9.2 Receiving a disclosure

Listen calmly, take the person seriously and use only open questions needed to clarify immediate safety. Do not investigate, confront an alleged abuser or ask the person to repeat their account unnecessarily. Reassure them that they did the right thing in telling you, explain the next steps and ask what would help them feel safe. Do not offer promises about outcomes. Do not promise confidentiality. Report immediately to the DSL or deputy and make an attributable written record as soon as possible, normally the same working day. Use the person's words, actual dates and times and a clear factual account. Confirm handover; a form must never delay urgent action.

9.3 Early support and Family Help for children

For children, the DSL considers universal services, community-based early help and targeted Family Help under Working Together 2026 and local thresholds. Work with the child, family and relevant agencies, agree responsibilities and review outcomes. Escalate promptly if risk increases or support is ineffective. For adults, agree appropriate support and referrals under section 9.11; do not assume children's Family Help arrangements apply.

9.4 Referrals

Use the local authority and police routes relevant to where the person lives, is located and where the harm occurred. For nationwide learners, the DSL confirms the correct area, records agency contacts and agrees cross-boundary coordination. Warrington contacts below are not a substitute for the learner's local arrangements. For Warrington child concerns: 01925 443322, option 1 then option 1, and the MARS route for professionals. Out of hours: 01925 443322 option 2; the safeguarding partnership also publishes 01925 444400. For adults: 01925 443322 or 01925 444400 out of hours. If immediate danger, call 999. Record submission and receipt, agency reference and agreed next steps. Follow up if a child referral has no response within one working day, or sooner if risk requires. For adults agree the response timescale and chase if no response. Use the local escalation procedure if a decision leaves unresolved risk; do not close a case simply because a referral was sent. The DSL must give every referral a named owner and follow-up date. Where no adult response timescale can be agreed, seek an update within two working days, sooner for increased risk. Internal case review continues while an agency response is outstanding. If agencies disagree or decline a referral, record the reasons, challenge through the relevant safeguarding partnership escalation process where risk remains, and maintain protective support.

9.5 Female genital mutilation

Any teacher who discovers that an act of FGM appears to have been carried out on a girl under 18 has a personal duty to report this to the police. Other staff must report concerns to the DSL and follow local safeguarding procedures. Staff must not physically examine learners.

9.6 Prevent and radicalisation

Staff report concerns about any learner being drawn into terrorism to the DSL promptly. The DSL applies notice, check, share, considers the individual circumstances and follows the current National Prevent referral process to the relevant police force. Channel support is voluntary; do not confuse consent to Channel support with the lawful basis for sharing a referral. Religion, ethnicity, lawful political opinion, disability or mental ill-health alone are not grounds for referral. Review the Prevent risk assessment at least annually and when local, online or cohort risks change. Staff receive role-appropriate training and know referral and escalation routes.

9.7 Mental health

Staff notice and act on changes in wellbeing, withdrawal, distress, self-harm, suicidal statements, exploitation or abuse. Mental ill-health may create or indicate safeguarding risk, but is not automatically abuse or radicalisation. Staff do not diagnose; the DSL assesses immediate safety, records the concern and arranges appropriate health or safeguarding help. In a crisis use 999 where there is immediate danger, or the local urgent mental-health service or NHS 111 for urgent support where appropriate. Agree a safety and support plan, a named contact and follow-up; do not leave a high-risk concern in a routine progress-review queue.

9.8 Concerns about a member of staff, volunteer or contractor

Report allegations about staff, volunteers, contractors or associates immediately to Debbie Ryan as case manager. If Debbie Ryan is implicated, report to Paul Ryder. Any allegation concerning Paul Conroy must also go directly to Paul Ryder; do not send it through Paul Conroy or a mailbox he controls. Paul Ryder's contact details are in the table. If the board contact is unavailable, conflicted or the concern is not being acted on, contact the relevant external service directly. Child-related allegations use the LADO; adult allegations use adult safeguarding, the local position-of-trust process and police as appropriate. Concerns about employer staff or workplace mentors must also be reported to the DSL so that learner protection and independent external referrals are coordinated; contact a safe employer representative only when appropriate. If Paul Ryder is implicated or conflicted, bypass him and contact the relevant LADO, adult safeguarding service or police directly, while informing an unconflicted senior decision-maker where safe.

9.9 Abuse between learners including sexual harassment and violence

Never dismiss harassment, harmful sexual behaviour, violence or coercion as banter, a normal relationship issue or part of growing up. Abuse may escalate along a continuum and may be online or offline. All reports will be taken seriously, recorded and passed to the DSL. Provide immediate, separate support to the person harmed, the alleged perpetrator and others affected, without prejudging outcomes. The DSL records and regularly reviews risk, contact and learning arrangements. For children, use KCSIE Part five and involve children's social care and police as required. For adults, use section 9.11 and relevant police or specialist sexual-violence services. Do not require mediation or an informal resolution where this could expose someone to further harm. For reports involving children of rape, assault by penetration or sexual assault, the DSL follows the police reporting requirements in KCSIE Part five, alongside immediate protection and support. The learner must not be disadvantaged for raising a concern.

9.10 Nudes and semi nudes including AI generated imagery

Any incident involving a child's nude or semi-nude imagery requires a safeguarding response, whether described as consensual or not and whether real, altered or AI-generated. Report immediately to the DSL. Adult intimate-image abuse, threats or sexual extortion also require prompt assessment and support. Staff must not request, copy, screenshot, print, forward or upload sexual imagery. Do not deliberately view it or ask a learner to send it. If seen accidentally, stop viewing, record how it came to attention without reproducing it, and contact the DSL. Preserve relevant devices or links safely; do not delete material or conduct your own evidence search. The DSL follows UKCIS and police advice, including the exceptional safeguards around any decision to view an image. The DSL will make decisions in line with national guidance, including whether police or children's social care involvement is required.

9.11 Adult safeguarding and welfare procedure

All concerns about adults are heard and assessed. The Care Act section 42 threshold is met where an adult has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves. Needs do not have to be met by a service or meet a funding eligibility threshold. The local authority decides whether a section 42 enquiry is required. Staff refer suspected cases; they must not withhold a referral because they cannot prove every element.

The DSL records the concern, immediate risk, the adult's own account, desired outcomes and communication needs. Consider physical, sexual, psychological, financial or discriminatory abuse, domestic abuse, coercive control, stalking, modern slavery, organisational abuse, neglect and self-neglect. Consider whether other adults or children may be at risk. A concern below the Care Act threshold may still require police, health, domestic-abuse, employment or other welfare support.

Seek the adult's agreement to referrals and involve them throughout where safe. Presume capacity, support decision-making and assess capacity for the specific decision at the relevant time if there is reason for doubt. An unwise decision alone does not establish lack of capacity. Where capacity is lacking, follow the Mental Capacity Act, best interests and the least restrictive option, taking appropriate professional advice and considering advocacy.

If a capacitous adult declines help, explore their reasons and possible coercion, explain options and normally respect their decision. Sharing or referral without agreement may nevertheless be necessary and lawful, for example to protect someone from serious harm, protect other people or children, comply with a legal duty or address coercion. The DSL records the justification, proportionality and relevant legal basis and seeks agency advice. Do not delay emergency action while seeking consent.

Refer to the relevant adult safeguarding service when the threshold is suspected; contact police for immediate danger or a suspected crime as appropriate. Agree responsibilities, support, review date and agency follow-up. Reassess if risk changes. Record closure reasons and the adult's view of the outcome, including any continuing support. An absence of open cases must be supported by an accurate log and review, not an assumption that no concerns exist.

The DSL must establish a safe method and time for contact, particularly where coercive control, domestic abuse or surveillance is suspected. Support plans identify immediate protection, the adult's wishes, the responsible person, agency involvement and the next review. Consider independent advocacy and seek local authority advice where the adult has substantial difficulty participating or lacks a suitable independent supporter. A referral does not end our responsibility for safe learning and follow-up.

10 Online safety, filtering, monitoring and mobile technology

We teach safe online behaviour and apply proportionate technical and organisational safeguards across the systems we control.

Debbie Ryan leads an evidenced review at least once every academic year with Paul Conroy and technical support; the board scrutinises the result. Test before new devices or services are used and after material changes or incidents. Record coverage, tests, weaknesses, owners and deadlines.

Debbie Ryan ensures technical security, configuration, access controls, patches and backups are managed. Paul Conroy determines safeguarding alert thresholds and the safeguarding response; Jane Dilorenzo covers his absence. The monitoring plan specifies who checks reports, frequency, escalation and cover. It includes weekly review of relevant monitoring reports and immediate escalation of high-risk alerts, with documented outcomes. No one may assume the platform or employer automatically reports concerns to us.

The review covers harmful content, harmful contact, conduct and commercial risks, including scams and gambling; SEND and accessibility; staff and learner accounts; BYOD; home and employer devices; mobile data; and AI-generated, real-time or personalised content. Document technical limits honestly. Employer and home networks are not assumed to be under Academy control. Use proportionate alternatives such as agreed employer safeguards, secure learning platforms, supervised sessions, learner education and direct reporting routes.

Use approved work accounts and channels for learner contact. Apply secure meeting access, appropriate backgrounds and professional boundaries. Recording requires a defined purpose, permission under the Academy process, clear information to participants, a lawful basis and restricted access and retention. Do not use personal accounts to collect safeguarding disclosures or make unauthorised recordings. A learner's privacy or connectivity difficulty requires discussion and risk assessment, not an automatic adverse judgement.

Debbie Ryan approves generative AI and other digital tools only after privacy, security and safeguarding risks have been assessed with the DSL, including age restrictions and product safety guidance. Do not put identifiable safeguarding information into unapproved AI services. Staff teach learners how to recognise grooming, coercion, manipulated images, misinformation, harmful content and financial scams, protect accounts and report concerns. Any filtering exception needs a recorded educational reason, risk assessment, expiry and Debbie Ryan's approval with DSL input; it must not disable necessary protection.

Staff report filtering failures, suspicious contact and safeguarding alerts immediately to the DSL and the IT lead. Technical staff preserve relevant logs securely and tell the DSL the limits of the available evidence. The review must identify systems without monitoring, who receives alerts, actual response coverage and what alternative protection is used. A technical product or an employer assurance alone is not evidence that a control works.

11 Learners who may need additional support

The organisation recognises that safeguarding issues can affect attendance, participation, behaviour, communication, progress and wellbeing.

The DSL considers each learner's needs and barriers, including SEND, health conditions, caring responsibilities, care experience, discrimination and isolation. Use accessible communication and reasonable adjustments. For children, consider current or previous social-worker involvement and the needs of looked-after or previously looked-after children. Do not assume a health condition or disability explains an injury or distress.

Where a child has a social worker, this will be considered in decision-making, support planning and attendance follow-up.

Tutors follow up unexpected absence and disengagement promptly according to risk, recording contact attempts and outcomes. If an under-18 learner is absent unexpectedly, check their safety promptly with appropriate contacts and escalate unresolved concerns the same day. For adults, consider wellbeing,

coercion, workload and support needs; agree safe contact and escalation without routinely contacting family or employers about private matters. Repeated absence must not conceal an unaddressed safeguarding risk.

For an unexpected absence, the tutor checks known vulnerability and any existing safety plan on the day it becomes known. Where circumstances indicate possible harm, they alert the DSL immediately and agree safe contact attempts and a deadline for escalation. An employer absence report must be checked against the learner's account where safe. Emergency services are contacted when the known circumstances indicate immediate danger; staff must not wait for the next scheduled review.

12 Safer recruitment and appointment checks

Impact Academy is committed to safer recruitment and will ensure that all recruitment processes reflect the safeguarding responsibilities of the organisation.

At least one person involved in recruitment must have current safer-recruitment competence.

Recruitment includes a clear role description, structured assessment, scrutiny of work history and unexplained gaps, verified references and a recorded appointment decision.

Complete identity and right-to-work checks and verify relevant qualifications, references and role-specific suitability before unsupervised work. Assess DBS eligibility from actual duties, learner ages, setting and frequency. The title Tutor or an adult learner's disability alone does not establish eligibility for Standard, Enhanced or barred-list checks. Request only the lawful level and workforce, recording the rationale; seek DBS or registered-body advice if uncertain. Assess relevant overseas, prohibition and other checks individually. Online searches, where used, must be proportionate, disclosed to shortlisted applicants and relevant to suitability.

Maintain an accurate central recruitment record showing the check required or reason not applicable, date completed, who verified it, outcome and secure evidence location. Record outstanding checks and authorised restrictions honestly. Do not backdate checks or treat an order as a completed check. A DBS certificate has no fixed statutory expiry; reassessment or a fresh eligible check follows duties, concerns, policy and lawful Update Service arrangements.

For agency staff, contractors, associates and any commissioned third-party delivery, the responsible manager must obtain written confirmation of the role-appropriate checks before deployment. The confirmation must identify the person, relevant role and checks completed, with dates and verification sufficient to support assurance. Identity is checked on arrival or before access is granted. Missing or ambiguous assurance must be resolved before the person undertakes activity for which the checks are required.

Where a role involves children, apply current KCSIE and DBS requirements before deployment. From 1 September 2026 the former supervision exemption for relevant work and volunteer activity with children has been removed; supervision alone must not be relied on to avoid a required barred-list check. Reassess before any move from adult-only work to child-related work. Barred-list eligibility for adults depends on regulated activities such as specified health or personal care, not ordinary adult apprenticeship teaching.

For supplied staff and relevant contractors, obtain written confirmation of the checks applicable to the role and verify identity on arrival. Agree supervision and access boundaries for visitors. No safeguarding concern is waived because a person has a clear DBS certificate. Staff report changes in suitability or concerns promptly.

An ordinary employer or workplace mentor is not automatically subject to the same DBS checks as Academy staff. We assess actual duties, contact with children or adults, legal eligibility and applicable placement requirements. Before any under-18 placement, the DSL and recruitment lead must apply current KCSIE work-experience requirements. No blanket demand for an enhanced or barred-list check may replace a lawful, recorded assessment.

13 Allegations against staff and low level concerns

13.1 Concerns that may meet the harm threshold

The child-related harm threshold includes behaviour that harmed or may have harmed a child; may constitute a criminal offence against or related to a child; indicates a risk of harm to children; or suggests the person may not be suitable to work with children, including conduct outside work. The case manager contacts the relevant LADO without delay and within one working day, seeking advice if unsure. Adult concerns go through adult safeguarding or the local position-of-trust process and police as appropriate.

Do not investigate before appropriate agency advice, beyond basic facts needed for immediate protection. Record the allegation, preserve relevant evidence, consider proportionate protective arrangements and support those involved. Suspension is not automatic. Keep the matter confidential, coordinate employment and safeguarding processes, and follow agency advice about informing the person concerned. An internal investigation does not replace a statutory referral.

13.2 Low level concerns

Low-level concerns are any concerns, however small, that behaviour may be inconsistent with the staff code of conduct but does not meet the harm threshold.

All staff must report low-level concerns promptly to Debbie Ryan, including concerns about conduct outside work, and may self-refer. Concerns about Paul Conroy or Debbie Ryan go directly to Paul Ryder. Staff should report uncertainty rather than decide alone that a concern is too small to record.

Record low-level concerns, however small, in a restricted staff-concern record, including context, action and decision. The case manager reviews patterns and escalates if the harm threshold may be met. A concern about Paul Conroy or Debbie Ryan goes to Paul Ryder. Retain records at least until the person leaves employment, subject to documented retention rules and any legal hold; do not automatically delete on departure.

Where the legal conditions are met, make a DBS referral when a person is removed, or would have been removed had they not left, from regulated activity because of relevant harm or risk. Resignation does not remove the duty. Consider Teaching Regulation Agency referral where relevant. Record the decision and evidence. References must distinguish substantiated safeguarding findings from unsubstantiated, unfounded, false or malicious allegations; seek appropriate advice and follow KCSIE Part four.

13.3 Whistleblowing and challenge

Staff, learners and employers can raise concerns about unsafe practice, a failure to act or interference with a safeguarding referral. Report to Debbie Ryan, or to Paul Ryder where Debbie Ryan or Paul Conroy is implicated. Where that route is unavailable, conflicted or ineffective, use the relevant statutory service directly. Urgent child or adult protection concerns must not be routed only through a complaints process or deferred to Ofsted.

The Academy will not tolerate retaliation against anyone who raises a concern in good faith. The unconflicted case manager must record the concern, protective action, response and reasons, and tell the reporter how to escalate if risk remains. Confidentiality is maintained as far as lawful and practicable; anonymity cannot be guaranteed. Leaders must not obstruct lawful external reporting.

14 Record-keeping

Record every concern, including welfare concerns that do not become external referrals, discussions, decisions, reasons, actions, outcomes and follow-up. Use the safeguarding concern reporting record or an equivalent secure record. Include personal details, factual account, dates, immediate risks, action taken, referrals, decision-maker, reasons and follow-up. For adults, record their wishes, consent or the reason for sharing without consent, and any decision-specific capacity concerns. Retain the original account and a dated chronology; corrections must remain traceable.

The DSL owns the safeguarding case record and access list. Debbie Ryan ensures appropriate technical permissions and secure backup. Limit access to authorised safeguarding personnel and the independent case manager where relevant. A general Ofsted folder may hold blank templates and anonymised assurance, never unrestricted case files. Record who received a referral and confirmation of receipt.

Keep adult safeguarding and child-protection case files separate from routine learning records and staff-allegation files. Aptom should contain only the minimum support information appropriate to its access permissions, with a restricted reference where necessary, not the detailed disclosure in employer-visible notes.

For a child transferring setting, send the child-protection file securely and separately from the main learner record within five days of an in-year transfer or the first five days of a new term, and confirm receipt. Provide a structured summary distinguishing current risk, support and relevant history; the receiving DSL reviews it and seeks clarification where needed. For an adult transfer, share only necessary information on a lawful basis, considering wishes and risk; do not apply child-file rules automatically.

The DSL and Debbie Ryan maintain an approved retention schedule by record type and legal purpose, including transfer, allegations, adult safeguarding and litigation or inquiry holds. Access, secure disposal and reasons for retention must be recorded. Do not destroy relevant records while a concern, investigation, complaint, referral or legal hold is unresolved.

The case owner records an initial risk assessment and review date on receipt. Urgent protection and referral decisions must be made immediately; a documented initial assessment must be completed the same working day where practicable and no later than the next working day for a non-urgent concern. High-risk cases are reviewed at least each working day while immediate risks remain unresolved; other open cases are reviewed at least weekly or sooner as the plan requires. The DSL records why a case is closed, remaining support and how to reopen it if circumstances change.

15 Training

All staff complete role-appropriate safeguarding, adult safeguarding, child protection, Prevent and online-safety induction, then regular training and updates at least annually. Training includes the current policy, reporting and escalation, consent and capacity, digital risks and practical scenarios. Reading or an invitation alone is not evidence of competence; record attendance, completion, understanding and application.

Paul Conroy and Jane Dilorenzo complete appropriate DSL and deputy training, updated at least every two years, with knowledge and skills refreshed at least annually and sooner when needed. This is our adopted minimum, aligned with KCSIE for child-related responsibilities; training must also cover adult safeguarding and local referral practice. Training completion and renewal dates are recorded in the training matrix. Jane Dilorenzo has completed her safeguarding training.

Board members and senior leaders receive safeguarding training at induction and regular updates appropriate to their roles. Debbie Ryan's training includes filtering, monitoring and IT oversight. Paul Ryder receives preparation for independent allegations management. Recruitment staff receive appropriate safer-recruitment updates.

Training will include child-on-child abuse, sexual violence and sexual harassment, professional boundaries, Prevent, information sharing, record-keeping, and how to respond to disclosures.

The DSL maintains a training matrix showing role, course or briefing, completion date, evidence location, understanding check and next review or renewal. An overdue or incomplete requirement triggers a recorded cover or supervision decision and remedial action. Employer briefings and learner understanding checks are recorded separately from staff qualifications. Training records must reflect actual completion dates.

16 Monitoring and review

This policy will be reviewed at least annually and sooner if there is a change in legislation, guidance, local procedures, organisational structure or a learning review identifies a need to change practice.

Paul Conroy reports at least quarterly to the board on anonymised concerns and outcomes, referrals, low-level concerns, staff training, safer-recruitment exceptions, learner voice, employer safeguarding and digital risks. The board records challenge and actions, including nil returns where justified. Review safeguarding practice after incidents and test staff and learner understanding; a policy alone is not evidence of implementation.

16.1 Assurance and accountability

The DSL reviews the concern log and open cases at least weekly, checking overdue actions, referral acknowledgements, learner support and closure decisions. Debbie Ryan and the DSL review implementation at least monthly, including workforce changes, training, recruitment exceptions, employer assurance and digital safeguards. Serious concerns and missed protective actions are escalated immediately.

Quarterly board reports must show trends and outcomes, timeliness of action, unresolved risks, training and recruitment exceptions, learner and employer feedback, testing of reporting routes, filtering and monitoring findings, and the effectiveness of improvements. Counts must be anonymised and interpreted in context; a low number of disclosures must not be treated as proof that learners are safe.

The board records its questions, decisions, required action, owner and due date. It must check that actions have improved practice and that resources and cover are sufficient. The independent contact oversees assurance about allegations where the DSL or COO is implicated, without disclosing unnecessary personal information.

Evidence for inspection must demonstrate how the policy operates through sampled case handling, staff and learner understanding, employer checks, training, recruitment records, digital testing and governance challenge. Access to identifiable records must be controlled and lawful.

16.2 Approval and control

Debbie Ryan approves the policy and records the approval and effective date in the controlled policy register. The DSL maintains the current version, communicates changes to staff, learners and employers and withdraws superseded copies. Full review is required at least annually and sooner following a significant incident, change in provision, legislation or guidance. The next full review is due by 16 September 2027.

17 Linked policies and documents

Debbie Ryan is responsible for the controlled register of supporting policies and procedures. Each document has an accountable owner, version, approval and review arrangements and a location accessible to the staff who need it. Supporting procedures must be consistent with this policy and must not delay immediate protection or referral.

- Staff code of conduct

- Safer recruitment policy or procedures
- Online safety / acceptable use policy
- Whistleblowing policy
- Complaints policy
- Data protection / privacy notice
- Behaviour / learner conduct policy
- Equality, diversity and inclusion policy
- Health and safety policy
- Adult safeguarding and welfare procedure in section 9.11 and relevant local authority procedures
- Subcontractor / third-party due diligence procedures
- Employer safeguarding assessment, agreement and briefing record
- Safeguarding concern record and secure case management arrangements
- Prevent risk assessment and action plan
- Filtering and monitoring review and incident procedure
- Attendance and disengagement procedure
- Staff training matrix and central recruitment record
- Safeguarding retention schedule and secure information-sharing arrangements

Appendix A Categories and indicators of abuse

Physical abuse

This can include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It can also include fabricated or induced illness.

Emotional abuse

This is the persistent emotional maltreatment of a child causing severe and adverse effects on emotional development. It can include humiliation, intimidation, silencing, coercive control, exposure to domestic abuse and persistent bullying, including online bullying.

Sexual abuse

This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes physical and non-contact abuse, online abuse, grooming, exploitation and child-on-child sexual violence or harassment.

Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

Adult abuse and neglect

Adults may experience physical, sexual or psychological abuse; financial or material abuse; domestic abuse and coercive control; discriminatory or organisational abuse; modern slavery; neglect or acts of omission; and self-neglect. Indicators may include fear, unexplained injuries, restricted contact, loss of access to money, unsafe living or working conditions, or a controlling person speaking for them. See section 9.11. No single sign proves abuse, and the absence of visible injury does not rule it out.

Appendix B Specific safeguarding issues

Staff must consider the individual circumstances and report concerns rather than seek proof. Risk may arise at home, in the workplace, in the community or online, and different forms of harm may overlap.

- Exploitation, county lines, trafficking and modern slavery: look for control, threats, unexplained money or debt, forced work and restricted movement. A person may appear to consent while being exploited.
- Domestic abuse, stalking, forced marriage and honour-based abuse: use safe contact, avoid family or employer mediation, and seek specialist advice. Consider risks to children and other household members.
- Female genital mutilation: follow section 9.5, including the personal police-reporting duty where applicable.
- Sexual violence, harassment, upskirting and intimate-image abuse: provide immediate support, preserve evidence safely and follow sections 9.9 and 9.10.
- Bullying, discriminatory abuse and online harm: challenge patterns and harmful language; do not dismiss incidents as banter.
- Mental ill-health, substance misuse, homelessness and repeated absence: assess immediate safety and underlying abuse or exploitation; arrange appropriate health or welfare support.
- Children missing education and private fostering: where a child is involved, seek the relevant local authority advice and follow child-protection procedures.
- Radicalisation and terrorism: follow section 9.6 using individual evidence, professional curiosity and the Prevent route.

Appendix C Immediate action for staff and employers

- Protect: call 999 for immediate danger; give the location and known risks. Stay with the person or connected remotely if safe.
- Listen: take the disclosure seriously, ask only what is necessary for immediate safety, explain that relevant information may have to be shared, and avoid promises about outcomes.
- Report: telephone the DSL or deputy immediately and confirm receipt. Bypass anyone implicated. Allegations about Paul Conroy or Debbie Ryan go to Paul Ryder.
- Escalate: if no safe internal route responds or risk remains, contact the relevant adult or children's service, LADO or police directly. Internal permission is not required.
- Record: write the person's words, factual observations, dates, times, immediate action and handover as soon as possible, normally the same working day. Do not investigate or copy sexual imagery.
- Follow through: the case owner confirms protective action, referral receipt, support, the next review and the outcome. A sent email is not a completed safeguarding response.

Appendix D Official references

National guidance and local routes checked on 20 September 2026. Apply the version and legal duties in force at the time of action. The DSL monitors changes and communicates updated requirements to staff and employers.

[Keeping children safe in education 2026](#)

[Working together to safeguard children](#)

[Care and support statutory guidance chapter 14](#)

[Information sharing duty guidance](#)

[Prevent duty guidance and referral route](#)

[Get help for radicalisation concerns](#)

[Filtering and monitoring core standard](#)

[Ofsted further education and skills inspection toolkit](#)

[Regulated activity with children](#)

[UKCIS advice on nudes and semi nudes](#)

[Warrington children's referrals](#)

[Warrington adult safeguarding and position of trust routes](#)

[Warrington LADO](#)

Appendix E Minimum safeguarding concern record

Use the approved secure case system or reporting record. A form must never delay protection or referral. Record information known at the time; distinguish unknown facts from assumptions. Completed records are restricted safeguarding information.

- Case reference, date and time received, name and role of the recorder, and safe contact details.
- Person affected, age, current location, relevant needs and communication adjustments; others potentially at risk.
- The person's own words, what was observed, when and where the incident occurred, and the source of each material fact.
- Immediate danger, protective action, emergency contact and confirmation of handover.
- For adults: desired outcomes, agreement or refusal, possible coercion, decision-specific capacity concerns and advice obtained.
- For children: welfare assessment, parental involvement or reason not to involve, social-care involvement and relevant history.
- DSL or case manager assessment, risk level, decisions and reasons, including a decision not to refer.
- Information shared, recipient, purpose, lawful basis, secure method, date and receipt.
- Referral destination, agency reference, acknowledgement, agreed response time and escalation where necessary.
- Safety and support plan, named owner for every action, deadlines, learner updates and next review.
- Review entries, changes in risk, further agency advice and outcomes.
- Closure decision, reasons, the person's views, continuing support, transfer or retention arrangements, and route for renewed concerns.