

Safeguarding and Child Protection Policy

2026 - 2027

For implementation from 1 September 2026

Prepared in accordance with Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026

Policy control	Details
Policy owner	Designated Safeguarding Lead
Approved by	Board of Directors
Approval date	24 th August 2026
Effective from	1 September 2026
Review date	No later than 31 August 2027, and sooner following a change in law, guidance, local procedures or a safeguarding incident
Published	Website; staff policy system; available to parents/carers on request

Important: Until 31 August 2026, Keeping Children Safe in Education 2025 remains in force. This policy is intended for use from 1 September 2026 and must be checked against any final DfE corrections published on that date and current Hull and East Riding local safeguarding arrangements.

Key safeguarding personnel

Role	Named person / contact
Designated Safeguarding Lead (DSL)	Leila Goring
Deputy Designated Safeguarding Lead (DDSL)	Georgina Dent
Safeguarding Director	Kelly Foley
Designated Teacher for CLA	Leila Goring
Deputy Head of Centre	Lee Morgan
Online Safety / Filtering & Monitoring Lead	Eleanor Goring
Anti-bullying Lead	Lee Morgan
Learner Welfare Lead	Declan Goring
School Nurse	Sarah Davis
Safer Schools Partnership officers	Justin Robert and Natalie Bingham
SEND Lead	Sam Wainwright
Safeguarding email	safeguarding@baylearning.academy
Main telephone	01482 768682

These details must be checked whenever staffing changes. Staff must always know who is acting as DSL/DDSL on each operating day. The DSL retains ultimate lead responsibility; delegated activities do not transfer that responsibility.

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1. Status, scope and guiding principles

1.1 Purpose and scope

This policy sets out how Bay Learning Academy CIC ("Bay Learning Academy" or "the Academy") safeguards and promotes the welfare of every child who attends, receives remote education from, visits or otherwise engages with the provision. A child is anyone under the age of 18.

It applies to all employees, directors, agency and supply staff, contractors, consultants, trainees, work-experience supervisors, visitors and volunteers. It should be read with the Staff Safeguarding Handbook, Staff Code of Conduct, Behaviour Policy, Attendance Policy, Online Safety and Harms Policy, Whistleblowing Policy, Low-level Concerns Procedure, Safer Recruitment Policy and relevant commissioning agreements.

1.2 Legal and guidance framework

The policy has regard to the Children Acts 1989 and 2004; Education Act 2002; Counter-Terrorism and Security Act 2015; Domestic Abuse Act 2021; Equality Act 2010; Human Rights Act 1998; Data Protection Act 2018; UK GDPR; Data (Use and Access) Act 2025; Keeping Children Safe in Education 2026 (KCSIE); Working Together to Safeguard Children 2026; and applicable local safeguarding partnership procedures.

As a non-school additional provision, Bay Learning Academy will meet the safeguarding expectations placed on non-school additional providers through commissioning arrangements, applicable law, KCSIE

and the DfE voluntary national standards for non-school alternative provision. Nothing in this policy reduces the statutory duties of a commissioning school, college or local authority.

1.3 Definition of safeguarding

- providing help and support to meet children's needs as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring children grow up in circumstances consistent with safe and effective care;

promoting the upbringing of children within their family network, where safe and appropriate; and

- taking action to enable all children to have the best outcomes.

1.4 Principles

- Safeguarding is everyone's responsibility and the child's welfare is paramount.
- Staff will maintain an attitude of "it could happen here" and act in the child's best interests.
- Concerns will be acted on immediately; uncertainty is not a reason to delay speaking to the DSL.
- Children will be listened to, taken seriously, supported and never blamed or shamed for reporting.
- No single practitioner has the full picture; timely information sharing and multi-agency work are essential.
- Safeguarding practice will be anti-discriminatory, trauma-informed, professionally curious and responsive to SEND and communication needs.

2. Bay Learning Academy as non-school additional provision

The commissioning school continues to be responsible for safeguarding a pupil it places with a non-school additional provision provider and must satisfy itself that the placement meets the pupil's needs. Bay Learning Academy nevertheless has its own direct duty of care and will provide a safe environment, act on concerns and cooperate fully with commissioners and statutory agencies.

2.1 Before placement

- obtain sufficient information about the child's needs, vulnerabilities, risks, attendance, SEND, medical needs, social-care involvement, behaviour support, transport and emergency contacts;
- agree named safeguarding contacts, communication routes and arrangements for urgent and out-of-hours concerns;
- provide written confirmation that appropriate safer-recruitment checks have been carried out on people working at the provision;
- agree attendance reporting, review frequency, information-sharing and record-transfer arrangements; and
- refuse or pause a placement where essential information or safe arrangements are not available.

2.2 During placement

- notify the commissioning school promptly of safeguarding concerns, unexplained absence, incidents, changes in risk and relevant staffing arrangements;
- inform the commissioner of staffing changes that may put the child at risk and provide assurance that checks have been completed on new staff;
- participate in placement reviews and multi-agency meetings;
- ensure the child knows how to report concerns both to Bay and to their commissioning setting; and
- keep clear records of decisions, actions and communications.

Responsibility for making an immediate referral is never delayed while responsibility is discussed. The professional who identifies urgent risk will ensure action is taken, with the DSL coordinating wherever practicable.

3. Roles and responsibilities

3.1 Board of Directors

- ensure safeguarding and child protection are central to governance, strategy, policy and resourcing;
- approve and review this policy at least annually;
- ensure an appropriately senior DSL is appointed, supported, trained and given sufficient time, authority, funding and resources;
- ensure appropriate safeguarding arrangements for recruitment, online safety, filtering and monitoring, allegations and low-level concerns;
- receive safeguarding assurance and constructive challenge without receiving unnecessary identifying information;
- ensure all directors receive safeguarding and online-safety training at induction and regular updates; and
- appoint a trained case manager for allegations against the Principal, with the Safeguarding Director acting unless conflicted.

3.2 DSL and deputies

The DSL is a member of the senior leadership team and holds lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring. Full responsibilities reflect KCSIE 2026 Annex B.

- manage and support referrals to children's social care, police, Channel, DBS and other agencies;
- act as a source of support, advice and expertise;

- maintain the safeguarding picture and promote educational outcomes for children who have or have had a social worker;
- ensure records are accurate, secure, current and transferred appropriately;
- work with commissioners, safeguarding partners, parents/carers and relevant professionals;
- ensure children's wishes and feelings are understood and considered;
- lead staff training, updates and policy awareness; and
- ensure lessons are learned from incidents and practice is improved.

During operating hours the DSL or a deputy will be available. Where neither is immediately available, a clear and known cover arrangement will operate, including monitoring of the confidential safeguarding mailbox. Another trained senior member may receive and escalate information but does not become the DSL unless formally appointed and trained. Urgent action must never await the DSL's return.

3.3 All staff

- read and understand KCSIE 2026 Part One in full;
- know the identity and role of the DSL and DDSL;
- understand this policy, the Staff Code of Conduct, behaviour arrangements, safeguarding response to absence, whistleblowing and low-level concerns;
- recognise indicators of abuse, neglect, exploitation and modern slavery;
- record and report every concern without delay;
- support statutory agencies following a referral; and
- never investigate, promise secrecy or allow personal views about a child or family to prevent action.

4. Safeguarding culture and children's voice

Bay Learning Academy will provide a safe, respectful culture where children have trusted adults, know how to report, can raise concerns in different ways and receive a response. Reporting routes will be accessible to children with SEND, communication needs or limited literacy and will include speaking to any staff member, the DSL team, safeguarding email and external helplines.

- Children's wishes and feelings will be sought and considered, while explaining that professionals may need to take action that is not the child's preferred option.
- Victims will be reassured that they are being taken seriously, will be supported and are not creating a problem.
- Safeguarding information will be shared on a need-to-know basis; anonymity cannot be guaranteed.
- Learner voice, incident analysis and complaints will inform policy and practice.

Complaints, persistent correspondence or unreasonable behaviour by an adult will be managed under the Complaints and Controlling Access to Premises policies. No restriction on contact will prevent a

parent, carer, learner or visitor from reporting a safeguarding concern, and no complaint process will delay child-protection action.

- Concerns will not be minimised as banter, part of growing up or behaviour associated with SEND.

5. Training, induction and staff conduct

5.1 All staff

All staff receive safeguarding and child-protection training, including online safety and filtering and monitoring, at induction. Training is regularly updated and staff receive updates as required and at least annually. Induction includes this policy, KCSIE Part One, behaviour and absence arrangements, Staff Code of Conduct, whistleblowing, low-level concerns and the DSL's identity.

5.2 DSL training

The DSL and deputies undertake role-specific training at least every two years and Prevent awareness training. Their knowledge and skills are refreshed at regular intervals, as required, and at least annually. Training includes Family Help and statutory thresholds, information sharing, conferences, trauma, CCE/CSE, SEND, online safety, Prevent and listening to children.

5.3 Professional conduct

Staff must maintain appropriate professional boundaries in person and online, use authorised systems, avoid favouritism and report any situation that could be misconstrued. Breaches may be addressed as a low-level concern, allegation, disciplinary matter or criminal concern depending on the circumstances.

6. Recognising abuse, neglect, exploitation and other risks

Abuse, neglect, exploitation and safeguarding issues rarely occur in isolation. Harm may occur at home, in the community, within institutions, during transport, online or across several settings at once. Children may be harmed by adults or other children and may also cause harm to parents or caregivers.

6.1 Core categories

Category	Meaning
Physical abuse	Inflicting physical harm, including where illness is fabricated or deliberately induced.
Emotional abuse	Persistent emotional maltreatment, including verbal abuse, humiliation, intimidation, silencing, inappropriate expectations, serious bullying or exposure to ill-treatment.

Category	Meaning
Sexual abuse	Forcing or enticing a child into sexual activity, contact or non-contact, including grooming, sexual images and technology-facilitated abuse.
Neglect	Persistent failure to meet basic physical or psychological needs, including food, shelter, supervision, protection, medical care or emotional responsiveness.

6.2 Specific and overlapping issues

- child criminal exploitation, child sexual exploitation, county lines, trafficking, financial exploitation and modern slavery;
- domestic abuse, including teenage relationship abuse, coercive control and stalking;
- child-on-child abuse, bullying, prejudice-based abuse, harmful sexual behaviour, sexual harassment and sexual violence;
- serious violence, weapons, gangs and organised criminal networks;
- radicalisation and terrorism;
- female genital mutilation, forced marriage, honour- or faith-based abuse;
- making or sharing nudes and semi-nudes, including altered or AI-generated images;
- online abuse, grooming, cybercrime and harmful content;
- mental health concerns linked to abuse or risk;
- children missing from home, care or education;
- fabricated or induced illness, private fostering and homelessness; and
- child-to-parent or caregiver abuse.

6.3 Child exploitation and modern slavery

Exploitation may be carried out by an individual, gang or organised network and may involve exchange, coercion, debt, status, affection, threats or violence. A child may identify with the group exploiting them, may appear to consent or may be criminalised for conduct committed under coercion; none of this removes their status as a child who may be being harmed. The DSL will consider children's social care, police and National Referral Mechanism action as appropriate.

6.4 Female genital mutilation

All concerns about FGM must be reported immediately to the DSL. A teacher who discovers, through disclosure or visual evidence, that FGM appears to have been carried out on a girl under 18 has a personal statutory duty to report this directly to the police, ordinarily by calling 101. The teacher must also inform the DSL. Suspicions that a girl may be at risk are referred through normal safeguarding procedures.

6.5 Prevent

Bay Learning Academy will assess the risk of children being drawn into terrorism, provide appropriate training, maintain suitable IT arrangements and work in partnership. Concerns are reported to the DSL, who will consider advice, children's social care, police and Channel referral. Emergency risk is reported to police immediately.

7. Responding to concerns and disclosures

Immediate danger: Call 999 where a child or another person is in immediate danger or urgent medical or police assistance is required. Then inform the DSL as soon as possible.

7.1 When a child speaks

- Listen calmly and give the child time.
- Reassure the child that they have done the right thing and are being taken seriously.
- Do not promise confidentiality or secrecy. Explain that information will be shared only with people who need it to help keep them safe.
- Use only open prompts needed to clarify, such as "Tell me what happened". Do not investigate, repeatedly question or ask leading questions.
- Do not confront the alleged perpetrator.
- Make an accurate record using the child's own words, including date, time, context, questions asked and people present.
- Report to the DSL immediately. If the DSL/DDSL is unavailable or action is not being taken, make or support a direct referral to children's social care or police and record this.

7.2 Staff action

Any staff member may make a referral to children's social care. Staff do not need certainty that abuse has occurred. If a concern is not referred, the DSL records the rationale and support or monitoring agreed. The person raising the concern is told that it has been acted on, so far as confidentiality permits. If still concerned, they must escalate to senior leadership, children's social care, police, LADO or use whistleblowing routes.

7.3 Parents and carers

Parents/carers will normally be informed and involved. They will not be informed before advice or referral where this may increase risk, cause unreasonable delay, prejudice an investigation or place another person at risk. The reason for the decision will be recorded.

7.4 Follow-up, recording and professional challenge

The DSL will follow up every reported concern so that the outcome, action taken and rationale are recorded. The person who raised the concern will be told that it has been considered, so far as confidentiality permits. A concern is not closed merely because another agency has been contacted or because a threshold is not met.

Where Bay considers that a child remains at risk, the DSL will seek clarification, request reconsideration and use the relevant local safeguarding partnership escalation or resolving professional disagreement procedure. Staff must continue to challenge and escalate where the response does not appear to protect the child. Professional disagreement must never delay emergency action.

8. Family Help and referrals

Children may benefit from support before statutory intervention. KCSIE 2026 distinguishes universal services and community-based Early Help from targeted early help delivered through Family Help and statutory children's social care intervention.

Level	Response
Universal/community support	Accessible services and community-based Early Help when needs emerge.
Targeted Family Help	Coordinated targeted early help under sections 10 and 11 Children Act 2004.
Child in need	Assessment and services under section 17 Children Act 1989, including disabled children.
Child protection	Section 47 enquiries where there is reasonable cause to suspect significant harm.
Other statutory routes	Sections 20 and 31 Children Act 1989 where accommodation, care or supervision may be required.

Consent will normally be sought for voluntary support. Lack of consent does not prevent information sharing or referral where there is a lawful basis, risk of harm, risk of delay or concern that seeking consent would increase risk. The DSL will follow the threshold and referral process for the local authority responsible for the child. Hull children are referred through Hull arrangements; East Riding children through East Riding arrangements; uncertainty is resolved promptly and does not delay emergency action.

9. Child-on-child abuse, harmful sexual behaviour and sexual violence

Child-on-child abuse is never dismissed as banter, experimentation, part of growing up or an inevitable part of education. It is preventable and may be harmful to both the victim and alleged perpetrator. It can include bullying, physical violence, threats involving weapons, abuse in intimate relationships, sexual harassment, sexual violence, harmful sexual behaviour, upskirting, initiation/hazing, exploitation and abuse online.

9.1 Reports and risk assessment

All reports are passed immediately to the DSL. The DSL makes an immediate, written risk and needs assessment addressing the victim, alleged perpetrator, other children, location, transport, online contact, disability and communication needs. It is reviewed as circumstances change.

9.2 Sexual images

Every incident involving making or sharing nudes or semi-nudes requires a safeguarding response, whether apparently consensual or non-consensual and whether genuine, altered or AI-generated. Staff must not view, copy, print, forward or save imagery unless specifically required under the UKCIS procedure and authorised by the DSL. Devices are not searched beyond lawful policy and guidance.

9.3 Response options

- manage internally with recorded support and proportionate action;
- offer universal/community support or refer to Family Help;
- refer to children's social care;
- report to police where a crime may have been committed; and
- take simultaneous protective and behaviour action without prejudicing a criminal investigation.

The victim will be protected, supported and kept informed. The alleged perpetrator will also receive a safeguarding assessment and appropriate support. A victim will not be made to share classes or close spaces with an alleged perpetrator following a report of rape or assault by penetration while facts are established and agencies consulted. Decisions about parents/carers and information sharing will be made separately for each child.

10. Attendance and children absent from education

Absence can be a warning sign of abuse, neglect, exploitation, mental ill health, bullying, criminal activity or risk outside the home. Staff will respond particularly to repeated or prolonged absence, unexplained patterns and absence linked to part-time timetables, suspension, exclusion or AP placement.

- Attendance is recorded accurately for every expected session and reported to the commissioner through agreed arrangements.
- First-day and follow-up contact is undertaken in accordance with the Attendance Policy and individual risk plan.
- Unexplained or concerning absence is reported promptly to the DSL and commissioning school.
- Home visits or welfare checks are risk assessed and undertaken only under approved procedures.
- Where a child cannot be located or risk is acute, children's social care and police are contacted without delay.
- The Academy will not remove safeguarding concern simply because attendance responsibility sits with a commissioner.

10.1 Education neglect

Persistent failure by a parent or carer to secure a child's attendance or engage with reasonable support may amount to education neglect when it is causing, or is likely to cause, significant impairment to the child's education, development, health or wellbeing. Absence alone does not establish neglect and staff will consider barriers, SEND, health, transport, family circumstances and the child's voice.

Where education neglect is suspected, Bay will record the pattern and impact, continue reasonable support, notify the commissioning school and refer or escalate under the local threshold arrangements. Safeguarding action will not be delayed while attendance or enforcement responsibilities are clarified.

11. Children who may be at greater risk of harm

Any child may need support. Staff will be particularly alert where a child:

- has SEND, a disability, certain health conditions or communication needs;
- has a mental health need, is a young carer, is pregnant or is a parent;
- is looked after, previously looked after, in kinship care or has/had a social worker;
- is frequently missing from education, home or care;
- is on a part-time timetable, repeatedly removed from lessons, suspended, excluded or in AP/PRU;
- is affected by parental offending, a parent/carers in custody, domestic abuse, substance misuse or adult mental ill health;
- is homeless, in temporary accommodation, privately fostered or at risk of trafficking;
- is misusing substances, involved in crime, gangs or exploitation;
- is LGB or gender-questioning and may be targeted because of that; or
- is managed within the youth secure estate.

11.1 Young carers and housing instability

Young carers may experience hidden responsibilities, tiredness, anxiety, isolation, reduced attendance or inappropriate caring demands. Staff will listen without making assumptions, identify support with the

learner and family, and refer safeguarding concerns where caring arrangements place the child at risk or prevent their needs being met.

Homelessness, temporary accommodation, overcrowding, sofa-surfing and insecure housing may increase risks including neglect, exploitation, disrupted education, poor health and loss of support networks. Bay will respond promptly, work with the commissioning school and relevant housing or children's services, and avoid treating housing instability as merely an attendance issue.

11.2 SEND and medical needs

Staff will consider additional barriers including assumptions that behaviour or injury is caused by disability, communication difficulties, disproportionate bullying, inability to recognise abuse and cognitive understanding. Reasonable adjustments will be made to reporting, assessment and support. Medical information will be shared with those who need it for safe care.

Bay maintains current individual healthcare and allergy arrangements where required, ensures relevant staff know emergency procedures and provides appropriate information and training. Medicines, adrenaline auto-injectors and emergency responses are managed under the Medications, Allergens and First Aid policies and any commissioner-provided healthcare plan.

A medical incident is not automatically a safeguarding concern. However, repeated failure to provide essential medication, treatment, dietary protection or accurate medical information, or a pattern suggesting fabricated or induced illness or neglect, must be reported immediately to the DSL.

11.3 Mental health

Staff are not expected to diagnose. Mental health concerns may indicate abuse, neglect or exploitation. Where a mental health concern is also a safeguarding concern, it is reported immediately to the DSL, who will consider specialist support and statutory referral.

11.4 LGB and children questioning their gender

Bay Learning Academy will provide a safe and respectful environment and prevent bullying or discrimination. A child questioning their gender may need sensitive and thoughtful support. Decisions will be child-centred, cautious, individual and safeguarding-led, with parental involvement wherever possible unless this would place the child at risk. The child's wishes, age, maturity, SEND, family context, any relevant clinical input, the Equality Act 2010 and Human Rights Act 1998 will be considered. Gender non-conformity will not itself be treated as evidence of harm or a fixed identity.

Requests concerning names, pronouns, uniform or another element of social transition are not automatic. Bay will first consider the child's best interests and any impact on safety, privacy, dignity and the rights of others. Decisions and reasons will be recorded, reviewed and shared only on a need-to-know basis.

In accordance with KCSIE 2026, Bay will not permit a child over 8 to use toilets designated for the opposite biological sex, a child over 11 to use changing rooms designated for the opposite biological sex, or children to share overnight accommodation with children of the opposite biological sex. Suitable alternatives will be considered without removing required single-sex provision. Where a sport must be single-sex for safety, no exception will be made; otherwise participation requests will be considered in a balanced way, including fairness, safety and inclusion.

An individual written risk assessment and support plan will be completed where a request affects facilities, sport, privacy, records, safeguarding or another learner. Bay will consult the commissioning school where responsibilities are shared.

12. Online safety, filtering, monitoring, mobile phones and AI

Online safety is integrated into safeguarding, curriculum, behaviour, staff conduct and risk management. Risks are considered through the content, contact, conduct and commerce categories and may occur online and offline concurrently.

12.1 Filtering and monitoring

- appropriate filtering and monitoring systems are in place on Academy-managed systems and devices;
- roles and responsibilities are assigned and understood by directors, senior leaders, the DSL and IT support;
- effectiveness is reviewed at least once every academic year by the responsible SLT lead with the DSL and IT support;
- checks confirm that filtering works on all internet-connected devices and relevant locations, and records of checks and reviews are retained;
- blocks, alerts and incidents are reviewed and acted on; and
- systems do not unreasonably restrict teaching, safeguarding action or the needs of pupils with SEND.

12.2 Mobile phones and personal devices

Use is governed by the Mobile Phone and Staff Code of Conduct policies. Staff must not use personal devices to photograph, record or communicate privately with children. Child use is supervised and restricted proportionately, with reasonable adjustments where required. Confiscation and searching follow lawful policy and safeguarding considerations.

12.3 Generative AI

AI may support education but may also facilitate grooming, bullying, impersonation, harmful content, misinformation, deepfakes and sexual imagery. Use must be authorised, risk assessed, age appropriate

and compliant with data protection, intellectual property, online safety and behaviour requirements. Personal or safeguarding data must not be entered into unapproved systems. AI-generated nude or semi-nude imagery involving a child is treated as a safeguarding concern.

12.4 Remote education

Remote learning uses approved platforms, appropriate professional accounts and clear conduct expectations. Staff avoid one-to-one informal contact, unsuitable backgrounds or recording without authority. Parents/carers and learners are told how to report online concerns.

13. Information sharing, records and transfer

Safeguarding information is shared lawfully, proportionately, securely and in a timely way under UK GDPR, the Data Protection Act 2018 and Data (Use and Access) Act 2025. Data protection is not a barrier to sharing information to keep a child safe. Consent is not always required.

13.1 Records

- Records are factual, dated, timed and distinguish observation, the child's words, professional opinion and historical information.
- They include the concern, follow-up, action, decision, outcome and rationale, including why a referral was or was not made.
- Each child has a secure safeguarding record separate from the main learner file, with access limited to those who need it.
- Corrections preserve the original entry and audit trail.
- Information is retained under the Academy retention schedule and legal requirements.

13.2 Transfer and transitions

Safeguarding information is reviewed and acted on at every transition. Where a child changes school or college, the child protection file is transferred securely, separately from the main file, as soon as possible and within five days for an in-year transfer or within the first five days of a new term. Confirmation of receipt is obtained.

The exporting record includes a clear structured summary of current concerns, relevant historical context, ongoing support and risk. The receiving setting reviews it through an appropriately trained person and seeks clarification if incomplete. Where Bay is not the child's registered school, relevant information is shared promptly with the commissioner throughout placement and on exit under agreed arrangements.

14. Safer recruitment, visitors, contractors and volunteers

Bay Learning Academy follows KCSIE 2026 Part Three and maintains a single central record appropriate to its status and workforce. Recruitment includes identity, right to work, employment history, references, qualifications, prohibition/restriction checks where applicable, enhanced DBS and children's barred-list information for regulated activity, section 128 checks where relevant and appropriate overseas checks.

14.1 Recruitment

- At least one person involved in recruitment has completed safer-recruitment training.
- Applications are scrutinised and gaps or inconsistencies explored.
- Shortlisted candidates are informed that online searches may be undertaken as part of due diligence.
- References are obtained directly from the referee, verified and resolved before appointment where practicable.
- No unchecked person undertakes regulated activity. Risk-assessed supervision is documented where lawful pending information.
- DBS and other information is handled confidentially and fairly.

14.2 Volunteers and regulated activity

The former "supervision exemption" must not be relied on. A volunteer teaching, training, instructing or supervising children with the statutory frequency may be in regulated activity even if supervised. The role is assessed before appointment and the legally permitted level of DBS/barred-list check obtained. The statement that Bay does not currently use volunteers in contact with learners does not remove the need to apply these requirements if arrangements change.

14.3 Agency staff, contractors, trainees and visitors

Written confirmation of required checks is obtained from agencies and providers, and identity is verified on arrival. Safeguarding requirements are included in contracts. Unchecked contractors are never left unsupervised or permitted regulated activity. Visitors sign in, wear identification, receive safeguarding information and are supervised according to purpose and risk. Fee-funded trainee-teacher checks are confirmed by the training provider.

14.4 Work experience, external organisations and homestay

Before arranging work experience, Bay and the commissioning school will agree responsibility, assess the placement and learner's needs, confirm supervision and safeguarding contacts, brief the employer and learner, and establish reporting and emergency arrangements. Any adult whose role amounts to regulated activity must receive the legally required checks. Concerns arising during placement are reported to Bay and the commissioner without delay.

Where an external organisation uses Bay premises or delivers an activity, written safeguarding expectations, suitability checks, site arrangements, supervision, reporting routes and responsibility for allegations will be agreed before access. Bay will respond to concerns under this policy even where another organisation is also responsible.

Bay does not provide boarding, homestay or host-family accommodation. Such an arrangement must not be introduced without prior approval by the Board, legal and safeguarding advice, safer-recruitment and household checks, written procedures and an individual risk assessment.

15. Concerns and allegations about adults

15.1 Harm threshold

A concern may meet the harm threshold where an adult has behaved in a way that harmed or may have harmed a child; possibly committed an offence against or related to a child; behaved towards a child in a way indicating they may pose a risk; or behaved in or outside work in a way indicating they may not be suitable to work with children.

- Concerns about a staff member, volunteer, trainee or contractor are reported immediately to the Principal.
- Concerns about the Principal are reported to the Safeguarding Director or another unconflicted Director.
- The case manager contacts the relevant LADO without delay and before investigating.
- Immediate safety is addressed; suspension is not automatic and alternatives are considered with LADO/HR advice.
- Supply agencies, contractors and training providers share responsibility and are involved appropriately.
- Police, children's social care, DBS and professional-regulator referrals are made where required.

15.2 Low-level concerns

A low-level concern is behaviour inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, which does not meet the harm threshold. "Low-level" does not mean insignificant. Concerns and self-referrals are reported to the Principal, recorded securely, reviewed for patterns and addressed proportionately. Where doubt exists, LADO advice is sought.

15.3 Whistleblowing

Staff who believe safeguarding practice is unsafe, concerns are being concealed or action is inadequate must use the Whistleblowing Policy or contact children's social care, the LADO, police or the NSPCC whistleblowing advice line. No person will suffer detriment for raising a genuine concern in good faith.

16. Reasonable force and restrictive interventions

Reasonable force or another restrictive intervention is used only when lawful, necessary, reasonable and proportionate, for the shortest time and with the minimum force required. Prevention, de-escalation and relational practice are prioritised. Serious injury need not already be imminent for lawful reasonable force, but force is never used as punishment or to secure compliance where it is not otherwise lawful.

- Individual needs, SEND, disability, medical conditions, trauma, communication and known risks are considered.
- Planned restrictive interventions require an individual risk assessment and support plan.
- Staff receive suitable training for any planned intervention they may use.
- Incidents are recorded promptly, parents/carers and commissioners informed as appropriate, injuries assessed and safeguarding concerns referred.
- The child and staff are offered debrief and support, and the plan is reviewed to reduce recurrence.

Seclusion, isolation or withdrawal from normal supervision must never be used as punishment. Any safety-led separation must be the least restrictive option, for the shortest time, with appropriate observation, recording, review and access to help. A child must never be locked in a room or prevented from leaving unless a specific lawful emergency power applies and immediate safeguarding advice is obtained.

17. Site security and emergency preparedness

The Academy maintains proportionate access control, visitor management, evacuation, lockdown and emergency communication arrangements. Site, transport and off-site risks are assessed. Protective security and preparedness arrangements are reviewed in light of current DfE guidance and applicable duties under the Terrorism (Protection of Premises) Act 2025 as they come into force.

18. Curriculum and preventative education

Safeguarding is taught through a planned, inclusive and age-appropriate curriculum, including relationships, sex and health education, PSHE, online safety and preparation for adulthood. Teaching develops understanding of consent, healthy and abusive relationships, boundaries, discrimination, misogyny and misandry, racism, sexual harassment, exploitation, grooming, extremism, financial risk, reporting and help-seeking.

Content is adapted for SEND, developmental level and lived experience without lowering safeguarding expectations. External resources and visitors are checked for suitability and educational value. The Academy promotes zero tolerance of sexism, racism, homophobia, biphobia, sexual harassment, sexual violence and other prejudicial or derogatory behaviour.

19. Monitoring and review

- The DSL reviews implementation regularly and after significant incidents.
- The Board receives a formal safeguarding assurance report at least annually, with proportionate termly updates on training, referrals, allegations, attendance, online safety, recruitment, restrictive interventions, complaints and emerging themes. Reports protect children's identities and record scrutiny, challenge, actions and completion.
- Filtering and monitoring is reviewed at least annually.
- The policy is reviewed at least annually and sooner following legal, guidance, local-procedure or organisational change.
- Named contacts, links and staff roles are checked at least termly.
- KCSIE 2026 is checked again when the final version is published on 1 September 2026.

Appendix 1 – Staff safeguarding response

Situation	Required action
Immediate danger or serious crime in progress	Call 999, then inform the DSL.
Concern about a child	Record and report to DSL/DDSL immediately; do not wait for proof.
DSL unavailable	Use the stated cover route; if necessary refer directly to children's social care or police.
Concern about staff/adult	Report to Principal immediately; do not investigate.
Concern about Principal	Report to Safeguarding Director/unconflicted Director.
Low-level concern	Report to Principal under Low-level Concerns Procedure.
Action appears inadequate	Escalate, refer directly or use whistleblowing.
FGM discovered by a teacher	Teacher reports personally to police and informs DSL.

Appendix 2 – Recording checklist

- child's full name and date of birth;
- date, time, place and context;
- what was seen, heard or disclosed, using exact words where possible;
- demeanour, injuries or relevant behaviour without interpretation;
- open questions asked and answers given;

- people present;
- immediate action and protection;
- who was informed, when and how;
- decisions, rationale, referrals and outcomes; and
- author's name, role, date and signature/electronic authentication.

Do not photograph injuries on a personal device, ask a child to remove clothing, examine intimate areas or create your own body map outside approved procedure.

Appendix 3 – Local referral and emergency contacts

Verification required: The DSL must verify all local telephone numbers, email addresses, named officers and referral portals before 1 September 2026 and at least termly. Referrals must follow the arrangements for the local authority responsible for the child.

Service	Contact recorded in the previous policy
Emergency police/ambulance	999
Police non-emergency	101
Hull Early Help and Safeguarding Hub	01482 448879
Hull Emergency Duty Team	01482 300304
Hull Safeguarding Children Partnership	01482 846082
Hull LADO	01482 790933
East Riding Early Help Hub	01482 391700 / ehphub@eastriding.gov.uk
East Riding LADO	LADO@eastriding.gov.uk
NSPCC whistleblowing advice line	0800 028 0285
NSPCC Report Abuse in Education helpline	0800 136 663 / help@nspcc.org.uk
Childline	0800 1111
East Riding Safeguarding and Partnership Hub (SaPH)	01482 395500 / safeguardingchildrenshub@eastriding.gov.uk
East Riding Children's Emergency Duty Team	01482 393939 / alternative 07970 156272

Appendix 4 – Key definitions

Term	Definition
Child	A person under 18.
DSL/DDSL	Designated Safeguarding Lead / Deputy Designated Safeguarding Lead.
LADO	Local Authority Designated Officer for allegations concerning adults working with children.
Family Help	Targeted early help within the 2026 safeguarding framework; distinct from universal/community-based Early Help and statutory social care.
Child-on-child abuse	Abuse, harassment or violence by one or more children against another child, online or offline.
Harmful sexual behaviour	Developmentally inappropriate sexual behaviour which may be harmful or abusive, considered on a continuum through to sexual violence.
Regulated activity	Work defined by safeguarding legislation that may require an enhanced DBS check with children's barred-list information.
Data protection laws	UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

Appendix 5 – Principal references

- Department for Education, Keeping Children Safe in Education 2026.

Department for Education, Including guidance on children who are questioning their gender in Keeping Children Safe in Education, 2026.

Department for Education, Restrictive interventions, including the use of reasonable force, in schools, effective 1 April 2026.

Department for Education, Allergy safety in schools statutory guidance, June 2026, where applicable, alongside Bay's allergy procedures.

- HM Government, Working Together to Safeguard Children 2026.
- Department for Education, Arranging Alternative Provision: A Guide for Local Authorities and Schools, February 2025.
- Department for Education, voluntary national standards for non-school alternative provision.
- Department for Education, Information Sharing Advice for Safeguarding Practitioners.
- Department for Education, Prevent Duty Guidance and current education-sector support.
- UK Council for Internet Safety, Sharing Nudes and Semi-Nudes: Advice for Education Settings.

- Department for Education, current guidance on generative AI, filtering and monitoring, attendance, behaviour, exclusions, reasonable force/restrictive interventions and protective security.
- Hull Safeguarding Children Partnership and East Riding Safeguarding Children Partnership current threshold and procedure documents.

Where this policy and current legislation or statutory guidance differ, legislation and statutory guidance take precedence. The DSL will arrange an interim amendment and notify staff.