

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

Date of policy: 13/03/2026

This policy will be reviewed every 12 months (as a minimum) by our Senior Management Team.

Review Date: 13/03/2027

Safeguarding Roles and Responsibilities

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Table of Contents

Introduction	3
Our Commitment to Safeguarding	4
Relevant Legislation and Guidance	5
The role of the Designated Safeguarding Lead (DSL)	6
Definitions	7
Categories of abuse – Children	8
Safeguarding Children with SEND	11
Children Missing Education	12
Early Help	13
Categories of abuse - Adults at risk	16
Reporting & Response to Suspected, Alleged or Confirmed Cases of Abuse	18
Mental Health	19
Recruitment and Selection Process	19
DBS Process	20
Responding to Safeguarding Concerns	22
Reporting a Safeguarding Concern	23
Dealing with Allegations of abuse made against candidates	24
Duty to make a referral to the DBS	25
Whistle Blowing	25
Summary	25

Introduction

Safeguarding is a responsibility shared by all. AP Education recognises its obligation to protect and promote the welfare of children and adults at risk, adhering to statutory requirements, government guidance, and best practice standards in safeguarding. All individuals, regardless of age, disability, gender, racial background, religious belief, sexual orientation, or identity, are entitled to equal protection from harm or abuse.

This policy is applicable to all staff members and will be thoroughly communicated and enforced throughout AP Education. All personnel are required to adhere strictly to KCSIE guidance and must confirm, on an annual basis or following any legislative changes, that they have read and understood the relevant guidelines. Non-compliance with this policy or the company's safeguarding procedures may lead to disciplinary measures, including possible termination of employment or contract, and could also result in a referral to the Local Authority Designated Officer (LADO).

All staff placed by AP Education are required to become acquainted with the safeguarding procedures for children and adults at risk within their local authority, and to understand the processes involved in identifying, responding to, and reporting abuse and neglect in all forms.

At AP Education, all staff members are expected to adhere to and actively promote best practices in safeguarding. To do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of children and adults at risk.
- Undertake mandatory safeguarding and child protection training (every 1 year) and awareness sessions where provided.
- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.
- Understand the role of the DSL and DDSL within our organisation and are competent on their approach of reporting concerns to them.
- Understand the process of reporting concerns to AP Education DSL/DDSL only and information must not be discussed with any further parties to uphold confidentiality.
- Staff and tutors must never talk to school/local authority staff about any safeguarding concerns if they are not a DSL.

Our Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- AP Education has robust safer recruitment processes in line with KCSIE and Working Together to Safeguard Children that ensures that those who are known to be a risk to children or adults do not gain access to them; those whose actions suggest that they are a risk to children/adults are detected at the earliest stage and prevented from continuing to work with children/ adults; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Staff should be prepared to identify children who may need early help. Early help is providing support as soon as a problem appears at any point in the child's life, from early years to teenage years. Where identified this should be raised with the Local Authority.
- Staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and adults at risk.
- There is an open and transparent culture which enables staff to raise concerns around children/adults at risk, those that work with children/adults at risk, and processes within AP Education.
- It is as simple as possible for an individual to report concerns about harm or risk and clear procedures are implemented where safeguarding and child/adult protection issues arise. Where concerns are reported AP Education will ensure that individuals are supported.
- AP Education has robust policies and procedures in place, which are reviewed and updated at least every 12 months or in line with legislative updates.
- AP Education stays up to date with developments on safeguarding best practice and legislative changes, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- AP Education will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- AP Education will work in partnership with other services (including local authority children's and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

Relevant Legislation and Guidance

The principal legislation and guidance governing this policy is:

- Working Together to Safeguard Children 2023 (HM Government)
- Keeping Children Safe in Education 2025 (Department for Education)
- The Children Act 1989
- The Children Act 2004
- The Care Act 2014
- Care and Support Statutory Guidance 2023 (Department of Health and Social Care)
- Information Sharing: Guidance for practitioners and managers 2018 (HM Government)
- Rehabilitation of Offenders Act 1974
- Mandatory reporting of female genital mutilation (FGM) (Home office 2016)
- Disqualification under the Childcare Act 2006 - Update 2018 (Department for Education)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015 (Department for Education)
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for safer working practice for those working with Children and Young people in Education settings 2022 (Safer Recruitment Consortium)
- Mental Capacity Act 2005

This policy should be read in conjunction with our other relevant safeguarding policies, such as:

- Health and Safety Policy
- Allegations Policy
- Complaints Policy
- Code of Conduct
- Whistleblowing
- Behaviour Policy
- Online Safety Policy

The Role of the Designated Safeguarding Lead (DSL)

The role of the DSL includes:

- Ensuring that all relevant staff have received at induction safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to

filtering and monitoring) appropriate to their role and continue receiving training to enable the development of skills and good practice when working with children/adults at risk.

- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by staff members or partner agencies.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to candidates or children/adults at risk that they work with.
- Liaising with Designated Safeguarding Leads in partner organisations.
- Acting as a source of support, advice and expertise for staff with concerns and liaising with other agencies and professionals.
- Supporting staff involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant children or adult social care and if relevant, the police and/or the Local Authority's Designated Officer (LADO). To do this the DSL will need to consult the following:
 - Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. Further details on referral routes are located in
 - Working Together to Safeguard Children (2023), Care and Support Statutory Guidance 2022, and in Keeping Children Safe in Education (2025).
- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where a staff member or candidate has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and the company believes they pose a risk to children/vulnerable adults. The DSL will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the staff member or candidate.
- Keeping senior management apprised of any safeguarding incidents and their outcome.
- Liaising with the Company's Compliance Officer and Senior Management regarding training and skill development programmes available to staff and candidates.
- Policy development (or overseeing this), including ensuring that all policies are updated as and when needed, but in any event on an annual basis ensuring all staff are fully up to date.
- Ensuring that they have the contact details of all DSLs/DDSLs for all referring parties.

Definitions

According to the Children Act 1989, a 'child' is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure

estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18. The Care Act 2014 defines an 'adult at risk' as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and.
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines 'harm' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another"

Abuse may be perpetrated by an individual from the child or adult's school, college, day centre, community, family, those in a position of trust or another child/vulnerable adult.

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

Child on Child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and

rituals.

Categories of Abuse – Children/Child abuse can be one of the below different categories as set out in Working Together to Safeguard Children (2023):

Forms of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Physical Abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or

treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse. Definitions of both are defined below.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, or for the financial advantage or increased status of the perpetrator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact and can occur online.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation is a form of child abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity.

This may include, but is not limited to, county lines drug trafficking, theft, violence, carrying weapons, or other criminal behaviour. The child may receive something in return (such as money, protection, accommodation, affection or status) and may not recognise that they are being exploited.

Child Criminal Exploitation can involve physical force, intimidation, threats, debt bondage or psychological manipulation and can occur over time or as a one-off incident.

Other forms of abuse can be categorised as below:

Female Genital Mutilation (FGM): The World Health Organisation defines Female Genital Mutilation (FGM) as "Comprising of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons." (World Health Organisation-1997). AP Education can provide FGM training for all staff at the front line working with children if requested. We have a separate Female Genital Mutilation Policy which includes additional information on the definition, early identification of risk and action to take to ensure child safety.

Upskirting: This is a criminal offence which typically involves taking a picture under an individual's clothing without permission, with the intent of viewing their genitals to obtain sexual gratification or cause the victim humiliation or distress.

Terrorism/Radicalisation: Prevent is aimed at safeguarding and supporting vulnerable people to stop them from becoming terrorists or supporting terrorism. It is one of the four strands of the government's "CONTEST" counter-terrorism strategy; the other strands are Pursue, Protect and Prepare.

Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity.

It works with the consent of the vulnerable person or if appropriate, their parents. Referrals to Channel are assessed by a multi-agency panel consisting of the local authority, Police, health and education professionals and other key interested stakeholders.

The Channel process aims to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned.

Full details can be found on the Home Office website.

<https://homeofficemedia.blog.gov.uk/2021/10/18/factsheet-prevent-and-channel-2021/>

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. As part of our safeguarding policy, we follow Prevent and Channel guidance. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

For detailed guidance on the signs which may indicate abuse and neglect see What to do if you're worried your child is being abused (2015).

Safeguarding Children with SEND

Some children have an increased risk of experiencing abuse, and additional barriers can exist with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. The additional barriers that can exist when recognising abuse and neglect in this group, include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

- Communication barriers and difficulties in overcoming these barriers.
- Children with disabilities may have regular contact with a wide network of carers and other adults for practical assistance in daily living including personal intimate care, hence being mindful that such situations can increase risk.

Further information can be found from specialist organisations such as:
NSPCC- [Safeguarding children with special educational needs and disabilities.](#)

Children Missing Education

The Local Authority (LA) has a legal duty to identify when there are Children Missing in Education (CME) and help them back into education. Please refer to our Children Missing Education Policy and Attendance and Absence Policy v1 which highlights what AP Education will do to support the LA.

Early Help

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has mental health needs
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime group or county lines is frequently missing/ goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse • is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or forced marriage is a privately fostered child.

For a full detailed list of differing forms of abuse please see further information from Annex B, Keeping Children Safe in Education 2025 (Pages 149 – 170)

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

Categories of Abuse - Adults at Risk

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

Physical Abuse: including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.

Female Genital Mutilation (FGM): The World Health Organisation defines Female Genital Mutilation (FGM) as "Comprising of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons." (World Health Organisation-1997). AP Education can provide FGM training for all staff at the front line working with children if requested. We have a separate Female Genital Mutilation Policy which includes additional information on the definition, early identification of risk and action to take to ensure child safety.

Domestic Violence: including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.

Sexual Abuse: including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological Abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. Involving/exposing vulnerable people to terrorism, and/or the radicalisation of vulnerable into extremist or terrorist related activities.

Terrorism/Radicalisation

Prevent is aimed at safeguarding and supporting vulnerable people to stop them from becoming terrorists or supporting terrorism. It is one of the four strands of the government's "CONTEST" counter-terrorism strategy; the other strands are Pursue, Protect and Prepare.

Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity.

It works with the consent of the vulnerable person or if appropriate, their parents. Referrals to Channel are assessed by a multi-agency panel consisting of the local authority, Police,

health and education professionals and other key interested stakeholders.

The Channel process aims to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned.

Full details can be found on the Home Office website.

<https://homeofficemedia.blog.gov.uk/2021/10/18/factsheet-prevent-and-channel-2021/>

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. As part of our safeguarding policy, we follow Prevent and Channel guidance.

Financial or Material Abuse: including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Modern Slavery: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory Abuse: including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational Abuse: including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and Acts of Omission: including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Further

information can be found at:

<https://www.gov.uk/government/publications/adultsafeguardingstatement-of-governmentpolicy>

Reporting & Response to Suspected, Alleged or Confirmed Cases of Abuse

The Safeguarding Officer is the designated contact with direct responsibility for handling any suspected or alleged incidences of abuse. Any employee, contractor, temporary worker, parent, family member, carer or any other individual with concerns about possible abuse should report the matter to this member of our staff. Where it is suspected that such abuse may be caused by another staff member, then reporting the matter will be done in accordance with the company's Whistleblowing Policy.

Any instance of suspected or alleged abuse should be reported immediately to the Safeguarding Officer and the employee, contractor or temporary worker must not attempt to investigate the abuse themselves. The company will take vigorous action against anyone trying to suppress a possible report of abuse.

Contact details for the Safeguarding Lead:

Name: Sabrina Laverty

Tel No: 0203 761 0233

Email: safeguarding@ap-education.com

Address: Lovet House, Lovet Road, Harlow, Essex CM19 5TB

Deputy Designated Safeguarding Lead

Name: Raymond Jarvis

Tel No: 0800 488 0424

Email: safeguarding@ap-education.com

Address: Lovet House, Lovet Road, Harlow, Essex CM19 5TB

All incidences of child abuse or neglect will be reported immediately to the Local Authority Social Services Department, DBS and the Police. The company may also invoke its own disciplinary procedure, and the abuser may be suspended pending investigation.

In all cases, the Safeguarding Officer is responsible for maintaining complete case records of the suspicions raised, or allegations made, including dates, times and persons involved, and details of the time, date and content of any report made to the Local Authority Designated Officer, DBS and Police.

In addition, the company will undertake preventative action in the form of strategies to be implemented with the objective of halting further abuse and preventing a similar situation from arising elsewhere. Where such cases involve AP Education employees, contractors or

temporary workers, a robust review of current practices and procedures will take place to determine what additional protective measures, if any, need to be incorporated into the standard processes and systems.

Incidents of alleged / confirmed abuse will be logged and reviewed on a quarterly basis to identify and eliminate any possible adverse trends and inform the company regarding training needs.

If the person against whom the allegation is made is an employee of AP Education, then they will be informed of the allegation and their rights under the disciplinary procedure. If they are a contractor or temporary worker they may be suspended pending investigation. In the event that the person against whom the allegation is made is a 3rd party (e.g. parent, friend etc), then the Safeguarding Officer will consult with the appropriate authorities. The company expects its employees, contractors and temporary workers to take all possible steps to co-operate with investigations by any statutory bodies.

Safeguarding Awareness for Learners, Parents and Carers

AP Education is committed to ensuring that children, young people, parents and carers are aware of safeguarding arrangements and understand how to raise concerns.

Safeguarding information is shared with service users and their parents/carers through:

- Welcome packs provided at the start of a placement
- The AP Education website
- Direct communication from tutors or coordinators where appropriate

This information includes:

- An explanation of what safeguarding is
- Reassurance that concerns will be taken seriously
- Clear contact details for the Designated Safeguarding Lead and Deputy DSL
- Guidance on what to do if they are worried about abuse, neglect or unsafe behaviour

Parents, carers and service users are advised that safeguarding concerns can be raised about any individual, including staff members, tutors, volunteers, contractors or third parties. Concerns can be reported directly to AP Education's Designated Safeguarding Lead using the published contact details. Where concerns relate to the conduct of a staff member, these will be managed in line with the Allegations Policy and, where appropriate, referred to the Local Authority Designated Officer (LADO).

Safeguarding information is provided in a clear, accessible and age-appropriate manner, and AP Education works with partner organisations to ensure children and families understand how to seek help and raise concerns.

Low Level Concerns – Definition, Reporting, Logging & Escalation

At AP Education Ltd, we are committed to creating a culture of openness, transparency, and vigilance in safeguarding. Recognising, reporting, and recording *low level concerns* is a critical part of preventing harm and identifying patterns of behaviour that may pose a risk to children.

Low level concerns are not insignificant — when viewed collectively, they may indicate unsafe practice, boundary issues, or emerging safeguarding risks.

Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, that an adult working with children may have:

- Acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Behaved in a way that does not meet the harm threshold but may indicate a potential safeguarding risk
- Demonstrated poor judgement, boundary issues, or unprofessional behaviour
- Created a situation where their behaviour could be misinterpreted or lead to allegations

This includes behaviour towards a child, or behaviour that may impact safeguarding culture more broadly.

Importance of Reporting Low Level Concerns

All staff have a responsibility to report low level concerns because:

- It helps to identify patterns of behaviour early
- It supports a safer culture where concerns are shared without fear
- It protects both children and staff from harm or misunderstandings
- It enables the organisation to intervene before behaviour escalates
- It demonstrates compliance with statutory safeguarding expectations (KCSIE)

A failure to report low level concerns may allow inappropriate behaviour to go unnoticed or unchallenged.

Reporting Process

All staff (including tutors, agency staff, and contractors) must:

- Report low level concerns as soon as possible and within 24 hours
- Report directly to the Designated Safeguarding Lead (DSL)

Where the concern relates to the DSL, this must be reported to the Deputy DSL or senior leadership.

Reports should include:

- Factual account of what was observed or disclosed
- Date, time, and location of the incident
- Individuals involved
- Any immediate actions taken

Staff must not investigate concerns themselves.

Logging & Recording

At AP Education:

- All low-level concerns must be formally recorded on the safeguarding system
- Records must be:
 - Objective and factual
 - Completed promptly
 - Stored securely in line with data protection requirements

The DSL is responsible for reviewing and maintaining oversight of all low-level concerns.

DSL Review & Oversight

The DSL will:

- Review each concern to determine level of risk
- Identify any patterns, trends, or repeated behaviours
- Decide whether the concern:
 - Remains a low-level concern
 - Requires escalation to a safeguarding concern
 - Meets the threshold for LADO referral

Where appropriate, the DSL may:

- Speak with the individual involved
- Provide guidance, supervision, or additional training
- Implement risk management measures

Escalation

A low-level concern may be escalated where:

- There is a pattern of similar concerns
- Behaviour becomes more serious or repeated
- New information suggests a risk of harm to a child

In such cases, the DSL will:

- Reclassify the concern as a safeguarding concern
- Follow safeguarding procedures, including referral to MASH / LADO where required
- Consider suspension or restriction of duties in line with safeguarding protocols

Safer Culture Commitment

AP Education promotes a “it could happen here” safeguarding culture where:

- Staff feel confident to report concerns without fear of judgement
- Low level concerns are treated as professional safeguarding practice, not criticism
- Transparency and accountability are embedded across all roles

All staff are expected to actively contribute to this culture.

Parents, Carers and Representatives

AP Education recognises that parents, carers, advocates and others acting on behalf of a child or adult at risk play an important role in safeguarding and may be the first to identify concerns.

Parents, carers and representatives are encouraged to raise any safeguarding concerns directly with AP Education’s Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (listed above). This includes concerns about abuse, neglect or unsafe practice by any individual, including staff members, tutors, volunteers, contractors or third parties.

AP Education also recognises that, in some cases, a parent, carer or representative may be the source of safeguarding concern. In such circumstances, safeguarding action will always prioritise the welfare of the child or adult at risk, and concerns will be managed in line with statutory guidance and local safeguarding procedures.

Where informing a parent or carer may place a child or adult at increased risk, AP Education will follow advice from Children’s Social Care, Adult Social Care, the Police or the Local Authority Designated Officer (LADO), and may share information without consent where required to safeguard an individual.

Learner Empowerment & Personal Safety

AP Education is committed to empowering children, young people and adults at risk to understand personal safety, recognise when something does not feel right, and feel confident to raise concerns.

Learners are supported to develop an age-appropriate and capacity-appropriate understanding of safeguarding, including:

- What safeguarding means and why it is important
- What safe and unsafe behaviour looks like
- How to keep themselves safe in learning environments, online and in the community
- That abuse or neglect is never their fault

Learners are encouraged and supported to speak up if they feel worried, unsafe or uncomfortable. They are reassured that concerns will be taken seriously, listened to respectfully, and responded to appropriately.

AP Education ensures that safeguarding information is shared in clear, accessible and inclusive ways, taking account of individual needs, communication preferences, SEND and mental capacity. Support may include verbal explanations, written information, repetition, or trusted adults reinforcing key messages.

Learners are informed that they can raise concerns with:

- Their tutor or coordinator
- AP Education's Designated Safeguarding Lead or Deputy DSL
- Another trusted adult where appropriate

Support will be provided throughout the safeguarding process, and learners will be kept informed, where appropriate, about actions taken to help keep them safe.

Recognising Safeguarding Indicators and Triggers

Safeguarding concerns may arise from a single incident, a pattern of behaviour, or a gradual change over time. All staff have a responsibility to remain vigilant and to recognise indicators that may suggest a child or adult at risk is experiencing abuse, neglect or exploitation.

Indicators may include, but are not limited to:

- Changes in behaviour, mood, attendance or engagement
- Signs of emotional distress, anxiety, withdrawal or aggression
- Physical indicators or unexplained injuries
- Sexualised behaviour or language that is inappropriate for age or development
- Indicators of exploitation, criminal activity, radicalisation or modern slavery
- Concerns relating to mental health, self-harm or self-neglect

AP Education recognises the importance of early help. Low-level or emerging concerns should be recorded and shared with the Designated Safeguarding Lead to enable early intervention and prevent escalation.

Where concerns indicate significant harm, risk of harm, or immediate danger, these must be reported without delay to the DSL, who will take appropriate action in line with statutory guidance and local safeguarding procedures.

Staff should not attempt to investigate concerns themselves. Professional curiosity, accurate recording, timely reporting and escalation are essential to effective safeguarding

Mental Capacity and Informed Consent

AP Education recognises its duties under the Mental Capacity Act 2005, which applies to all individuals aged 16 and over.

The Mental Capacity Act provides a statutory framework for supporting individuals to make their own decisions wherever possible and for protecting those who may lack capacity to make specific decisions at a particular time.

All staff must apply the five statutory principles of the Mental Capacity Act:

1. A person must be assumed to have capacity unless it is established otherwise
2. A person must be supported to make their own decisions as far as possible
3. A person is not to be treated as unable to make a decision merely because they make an unwise decision
4. Any act or decision made on behalf of a person who lacks capacity must be in their best interests
5. Any action taken must be the least restrictive option

Determining Mental Capacity

Mental capacity is decision-specific and time-specific. AP Education staff do not make formal diagnoses of lack of capacity. Where there are concerns about an individual's ability to understand, retain, weigh or communicate a specific decision, this will be discussed with the Designated Safeguarding Lead.

Where appropriate, advice will be sought from relevant professionals such as Children's Social Care, Adult Social Care, health professionals or other statutory agencies to support a formal capacity assessment.

Where a learner or adult at risk is assessed as lacking capacity in relation to a safeguarding decision, AP Education will act in their best interests and take the least restrictive action necessary to protect them from harm.

All decisions made under the Mental Capacity Act will be clearly recorded, including:

- The decision in question
- The rationale for determining capacity
- The professionals consulted
- The actions agreed and safeguards put in place

The Designated Safeguarding Lead will ensure that all staff are aware of, and trained in, the principles of the Mental Capacity Act 2005, and that safeguarding practice aligns with its requirements.

Emergency Situations

If the situation is an emergency and a child is in immediate danger, employees, contractors and temporary workers are instructed to call for assistance immediately. They should give any necessary first aid and contact appropriate emergency services if necessary. If the abuser remains present and poses a threat to any employee, contractor or temporary worker present, they are not expected to put themselves at risk. Company procedures in relation to responding to abusive or aggressive behaviour are detailed in the company's induction training and in policies relating to Health & Safety.

Mental Health

Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If a situation occurs where the mental health of a child is a concern, a clear process will be put in place to identify the problem, including how to escalate and gain a clear referral.

Advice and information all relevant parties including the DSL should engage with key professionals, helping them to understand the role they have in improving the child's outcomes.

Recruitment and Selection Process

AP Education is committed to protecting children and adults at risk through a careful recruitment and selection process (see below), our complaints and whistleblowing policies and guidance on appropriate behaviour (Code of Conduct).

These documents should be read alongside this policy.

AP Education's rigorous procedures ensures that any member of staff found to have a history of unacceptable conduct or practice, will not be placed.

All staff are fully compliant based on KCSIE regulations in line with this policy.

Key Processes of our Recruitment Selection and Vetting Policy

When recruiting staff or temporary workers who take part in regulated activities involving children, AP Education will ensure the following:

- Thorough interviews are conducted to establish the candidate's employment history and any gaps identified, discussed and verified. This will be by trained staff who have received guidance in relation to current legislation and best practice pertaining to the recruitment and placement of candidates who are to take part in regulated activity.
- The member of staff's personal identity will be verified by checking an original form of recent photographic identification.
- Qualifications and training relevant to the role being recruited will be verified by checking original certificates and validating these for authenticity with the awarding body.
- A minimum of two written references, one being the most relevant position, covering the last three years of employment, with all gaps identified.
- All staff must hold a current AP Education Enhanced DBS Certificate including Children's Workforce Barred List check. If the DBS certificate was not processed through AP Education, then the member of staff must hold a Child Workforce Enhanced DBS certificate subscribed to the DBS Update Service.
- Signed Rehabilitation of the Offenders Act statement.
- Teaching Regulation Agency (TRA) online status and records checked for all candidates who hold QTS and confirmation through SET (Society for Education & Training) if a candidate holds QTLS.
- TRA status check for all associated sanction/barred lists IE. Prohibition Orders. Evidence of Right to Work in the UK.
- Health Declaration.
- Evidence of Child Protection Training completed (within the last 1 year as a minimum) or the candidate will complete AP Education Online Child Protection Training.
- As part of our recruitment process, candidates are sent the Department of Education's 'Keeping Children Safe in Education document where they must adhere to this guidance at all times. They are expected to sign to say that they have read and understood the KCSIE guidance annually.
- Completion of PREVENT training.

DBS Process

Staff joining AP Education are required to hold either a valid Enhanced DBS certificate with subscription to the update service or complete a new DBS Enhanced Disclosure; both of which will need to be with Barred List Check with the "Child Workforce" prior to placement.

- Where a DBS has been applied for by another company or employer and is subscribed to the Update Service, then the following steps will be taken:
- The original certificate is sighted, checked for any criminal information and a copy retained.
- An online Employer's Update Service check is completed with the permission of the candidate to ensure that the information on the original certificate remains unchanged.
- This is repeated annually unless there is a break of service of more than three months, then in this instance a new update service check will be completed.
- AP Education run internal risk assessments, any notified change to the original certificate will result in a new DBS certificate being required. If a worker in a role at the time of there being a change to the original certificate, the worker will be asked to provide a written statement to the compliance manager confirming the reason for the change. This statement will be forwarded to the client immediately so that a decision can be made as to whether the placement continues.

Safer Recruitment- Further checks are deemed appropriate for staff who have been living and/or working out of the country in recent years.

If a member of staff completes a new DBS certificate with AP Education and has subscribed to the Update Service, then the following will be completed:

- A copy of the member of staff's DBS certificate is sighted and a copy retained.
- An online Employer's Update Service check is completed and repeated annually to ensure that the information on the original certificate remains unchanged, unless as above.
- Any notified change to the original certificate will result in a new DBS certificate being required.

Staff who hold an AP Education DBS certificate but do not subscribe to the Update Service will be required to complete a new DBS check annually. All staff are encouraged to annually subscribe to the DBS Update Service.

If a member of staff registers with AP Education with cautions or convictions on their DBS a risk assessment will be carried out by the Compliance Manager and will determine whether to progress their application.

AP Education will then make the school/client aware of the reason and gain agreement that they wish to accept the member of staff.

Safer Working Practices

All staff, tutors, volunteers, contractors and agency workers engaged by AP Education are required to always adhere to Safer Working Practices. These standards underpin professional conduct, promote safe boundaries, and reduce the risk of harm or allegations.

AP Education aligns with *Guidance for Safer Working Practice for those working with Children and Young People in Education* and expects staff to:

- Maintain clear professional boundaries at all times
- Avoid behaviour that could be misinterpreted or place themselves or learners at risk
- Use appropriate language, tone and communication methods
- Follow guidance on one-to-one working, physical contact, online communication and use of technology
- Act as positive role models and promote respectful, safe relationships

Safer Working Practice guidance is shared through induction, training, policies and the Code of Conduct. Staff are expected to seek advice from the DSL if they are unsure whether a situation or behaviour is appropriate.

Any breach of Safer Working Practices will be taken seriously and managed in line with safeguarding procedures, the Allegations Policy and, where required, referral to the Local Authority Designated Officer (LADO).

Responding to Safeguarding Concerns

All staff have a responsibility to protect children/adults at risk. This includes:

- Observing AP Education policies and processes including any Code of Conduct
- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.
- Reporting any concerns arising from meeting staff or carrying out preplacement checks to the Designated Safeguarding Team without delay and making a clear written record of all relevant information to be passed to the DSL.
- Reporting any concerns arising from organisation visits/placements to the Designated Safeguarding Lead at the relevant organisation and confirming that this has been done to AP Education DSL

Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

Reporting a Safeguarding Concern

Our process is:

1. Once the student has confided in the tutor, reassurance is given to ensure that the issue has been heard, and our tutor is there to support the student.
2. If needed the tutor can reference their welcome pack which outlines our safeguarding policies and procedures to complete the next steps correctly.
3. In line with our safeguarding policy and in the event of having a child protection issue, tutors must report the concern to their Education Delivery Coordinator immediately. They must complete a written report, including a timeline of events the same working day. This report must be without opinion or hearsay. This is stored in line with GDPR.
4. Parents/carers are informed about the concern, and consent is gained for the tutor to make contact with all relevant parties (unless making this contact will put the child at risk).
5. Once AP Education have received the report, we will share the details with relevant parties to discuss next steps and an action plan is agreed with all key points of contacts. These steps will need to be taken to prevent any further risk/harm to the learner/others.
6. If the referral is deemed to be an Allegation of Harm, we will follow our Allegations Policy for appropriate next steps to take. Depending on the nature of the allegation the police or Children's Social Services may be informed.
7. At all times AP Education will ensure all relevant parties are kept updated with the progress on the investigation.
8. We work in collaboration with all agencies to support all actions taken. If the enquiry has been closed and the staff member believes that the concern has not been resolved, they can re-raise this issue internally and externally to ensure that the issue is resolved.

Duty to make a referral to the DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or adult at risk, there is a legal duty on AP Education to report that person to the Disclosure and Barring Service using their guidance. The DBS has statutory authority to bar a person from working in regulated activity with children and/or adults at risk in the UK.

A referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

AP Education will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children/vulnerable adults. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a child's or adult at risk's welfare or who believe that a child or adult at risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern

Whistleblowing

Staff may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting.

AP Education has a specific Whistleblowing Policy which encourages staff to raise concerns and also provides details of outside organisations that staff can approach for support and advice. AP Education aims to have an open and honest culture where safeguarding is responded to effectively, and both staff feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to. This will result in a LADO referral where necessary.

Safeguarding Assurance, Monitoring and Compliance

AP Education has clear assurance processes in place to ensure safeguarding policies and procedures are consistently implemented and adhered to across the organisation.

Safeguarding assurance is achieved through a combination of the following measures:

- Oversight by the Designated Safeguarding Lead (DSL) and Deputy DSL, including review of safeguarding concerns, referrals and outcomes
- Regular review of safeguarding records to ensure concerns are recorded accurately, escalated appropriately and managed in line with statutory guidance
- Monitoring of safeguarding training compliance to ensure all staff complete required safeguarding, Prevent and Safer Working Practice training within agreed timescales
- Ongoing monitoring of safer recruitment processes, including DBS checks, risk assessments and the Single Central Record
- Review of safeguarding incidents, themes and trends to identify learning, inform training needs and improve practice

Safeguarding performance and compliance are reviewed by senior management on a regular basis, and safeguarding remains a standing consideration within organisational decision-making.

Where gaps, concerns or non-compliance are identified, appropriate action is taken, which may include additional training, supervision, policy updates or disciplinary action.

This policy, and all associated safeguarding procedures, are reviewed at least annually or sooner in response to legislative changes, learning from safeguarding incidents, or changes in operational practice.

Summary

AP Education will make clients and staff aware of the Safeguarding Policy through the following means; Company Website, AP Welcome Pack & Code of Conduct.

All staff, temporary workers, and contractors must be aware that they have a professional duty to share information with other organisations to safeguard children/adults at risk. The public interest in safeguarding children/adults at risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by AP Education.

References:

Section 175 of the Education Act 2002:

<https://www.legislation.gov.uk/ukpga/2002/32/section/175>

Keeping Children Safe in Education:

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

Working Together to Safeguard Children:

https://assets.publishing.service.gov.uk/media/69c2c4ce380a2a73a7cf9df4/Working_together_to_safeguard_children_2026.pdf