Enemy of Boredom

Child Protection and Safeguarding Policy

including adults at risk

Approved by:	Steve Godwin, CEO
Date approved:	28th October 2026
Next review due by:	Within 12 months of approval, or sooner if legislation or statutory guidance changes
Policy owner:	Tracey Clark, COO
Applies to:	All staff, volunteers, contractors and learners, at all centres and in all online and off-site provision

1. Scope

This policy applies to everyone who works for or on behalf of Enemy of Boredom, whether paid or unpaid, including employees, tutors, volunteers, contractors, agency and supply staff, and board members. It covers every learner, whether a child or an adult learner, at all of our centres and in all online and off-site provision, including community and shared venues.

It should be read alongside our Behaviour Policy, Staff Code of Conduct, Safer Recruitment Policy, Data Protection Policy, Equality and Diversity Policy, Whistleblowing Policy and AI Policy. Where a commissioner's safeguarding requirements for a learner are stricter than this policy, we follow the commissioner's requirements for that learner.

2. Aims

Enemy of Boredom provides commissioned alternative provision for learners placed with us by schools and local authorities. Safeguarding is everybody's responsibility, and we expect all staff to stay alert to the possibility that abuse or neglect could happen here, as it could anywhere.

This policy aims to:

- keep every learner safe, and promote their welfare, at our centres, online and in the community;
- make sure every member of staff knows how to recognise a concern, record it and report it on the same day;
- set out clearly who does what, so that action is taken promptly and consistently and our commissioners always know what we are doing;

- protect learners from any adult who may pose a risk to them; and
- keep the voice, lived experience and wishes of the learner at the centre of safeguarding decisions and planning.

3. Legal and statutory framework

We act in line with the statutory guidance and legislation below. Guidance is referred to by name rather than by year, and each link leads to the current version.

- Keeping children safe in education (KCSIE). This is written for schools and colleges. Our commissioners are bound by it and the national standards for non-school alternative provision direct providers to it, so we follow it as our benchmark, including its guidance on allegations against staff.
- Working together to safeguard children, which sets out how agencies work together and how local safeguarding arrangements operate.
- Non-school alternative provision: voluntary national standards, which set the Department for Education's expectations of providers such as us.
- Information sharing to safeguard children and young people, the statutory guidance that accompanies the information sharing duty.
- Prevent duty guidance. Our commissioners must have due regard to the need to prevent people being drawn into terrorism, and we support them by following this guidance.
- Sharing nudes and semi-nudes: advice for education settings.
- Care and support statutory guidance, which governs the safeguarding of adults.

Our legal duties come principally from the Children Act 1989 and Children Act 2004 (including section 16LA, inserted by the Children's Wellbeing and Schools Act 2026); the Safeguarding Vulnerable Groups Act 2006; the Counter-Terrorism and Security Act 2015; the Care Act 2014; the Mental Capacity Act 2005; the Children and Families Act 2014; the Equality Act 2010; the Human Rights Act 1998; the Data Protection Act 2018 and UK GDPR; the Domestic Abuse Act 2021; the Female Genital Mutilation Act 2003; and the Modern Slavery Act 2015.

4. Definitions

Learner: any child or adult who receives provision from us.

Child: anyone under the age of 18.

Adult learner: a learner aged 18 or over.

Adult at risk: an adult who has care and support needs, who is experiencing or at risk of abuse or neglect, and who cannot protect themselves from it because of those needs.

Staff: everyone working for or on behalf of Enemy of Boredom, paid or unpaid, including tutors, volunteers, contractors and agency or supply staff.

Commissioner: the school or local authority that places a learner with us and remains responsible for that placement.

Centre: any location where we deliver provision, including shared, community and outdoor venues. Online provision is covered in section 14.

Designated Safeguarding Lead (DSL) and Deputy DSL: our named safeguarding leads for each area, identified in section 5.

Safeguarding partners: the local authority, health service and police for an area, who together set out local safeguarding arrangements and procedures.

Front door: the local authority's point of contact for referrals to children's social care. It is known by different names in different areas.

LADO: the local authority designated officer, who advises on and oversees the management of concerns and allegations about adults working with children. The LADO who leads is the one for the area where the adult works, not the area where the child lives.

Case manager: the person who leads our response to an allegation or concern about a member of staff (see section 11).

Harm threshold: the point at which an adult's conduct has harmed or may have harmed a child, may amount to a criminal offence against or related to a child, indicates a risk of harm to children, or suggests the person may be unsuitable to work with children.

Low-level concern: any concern about an adult's behaviour, however small, that does not meet the harm threshold but is inconsistent with our Staff Code of Conduct.

Nudes and semi-nudes: nude or semi-nude images or videos of a child, including images that have been digitally altered or generated by AI.

5. Roles and responsibilities

5.1 CEO, Board of Directors and COO

The CEO has overall responsibility for safeguarding across Enemy of Boredom and makes sure the DSLs and Deputy DSLs can carry out their roles effectively. The Board of Directors holds the CEO to account for this. Safeguarding is a standing agenda item at every Senior Leadership Team area meeting. The Senior Leadership Team is the COO and the Heads of Centre.

The COO makes sure DSLs and Deputy DSLs have the time, training and support they need, acts as case manager for allegations (section 11), leads the annual review of this policy with the Heads of Centre, and is responsible for our filtering and monitoring arrangements (section 14).

5.2 Heads of Centre

Each Head of Centre makes sure this policy is followed at their centre, that the names of the centre's DSL and Deputy DSL and how to contact them are displayed where staff, learners and visitors can see them, and that the centre arrangements in section 13 are in place.

5.3 Designated Safeguarding Leads and Deputy DSLs

Enemy of Boredom has appointed a DSL and a Deputy DSL for each area, with the status and authority to lead on child protection, welfare and the safeguarding of adults at risk. The DSL for a centre is usually its Head of Centre, and the Deputy DSL is often the centre's Lead Tutor, though the named appointments below are what matters in practice:

Area	Designated Safeguarding Lead	Deputy Designated Safeguarding Lead
Online	Tracey Clark, tracey.clark@eobacademy.com	Jo Parker, jo.parker@eobacademy.com
South East	Tracey Clark, tracey.clark@eobacademy.com	Jo Parker, jo.parker@eobacademy.com
Central	Nick Plews, nick.plews@eobacademy.com	Sarah Cook, sarah.cook@eobacademy.com
South West	Peter Goodman, peter@eobacademy.com	Nicky Millard, nicky.millard@eobacademy.com
North	Nick Plews, nick.plews@eobacademy.com	Shaun White, shaun.white@eobacademy.com

A DSL or Deputy DSL is available to staff whenever a centre is open or online provision is running. When the usual DSL is absent, the Deputy DSL takes over. If neither is available, staff contact the COO or the DSL of a neighbouring area if the COO is also unavailable. Each DSL:

- receives concerns from staff, decides what should happen next, and makes or agrees referrals with the commissioner;
- works with commissioners' safeguarding leads and local authority commissioning leads, and with children's social care, the LADO, the police, Prevent partners and other agencies;
- reviews the safeguarding information each commissioner provides for a learner and, where it shows significant concerns, completes a risk assessment before the placement starts;
- takes part in multi-agency meetings and contributes to assessments of learners attending our provision;
- keeps factual, dated and secure safeguarding records (section 15);
- supports and advises staff, and checks that staff have read this policy and completed their training;

- works with the COO and Heads of Centre to draft and review this policy; and
- keeps the CEO informed of safeguarding matters, except where the concern is about the CEO, in which case they go to the Chair of the Board of Directors.

5.4 All staff

All staff must read and understand this policy and Part One of KCSIE; complete safeguarding training; record every concern and report it to the DSL on the same day, or immediately if a learner is at risk; never promise confidentiality; and follow the Staff Code of Conduct. Staff must be alert to low-level concerns about colleagues as well as concerns about learners.

6. Working with commissioners

Commissioners remain responsible for the learners they place with us. We work with them as partners and make sure they always know what we are doing to keep their learners safe.

At the start of a placement. We ask the commissioner for the information we need to keep the learner safe, including safeguarding information, any child protection, child in need or looked-after plans, EHC plan, risk assessments, and attendance and exclusion history. We agree in writing who will take forward any safeguarding referral, us or the commissioner, and review that agreement if the learner's interests require it.

When a concern arises. The DSL shares every safeguarding concern with the commissioner's safeguarding lead or local authority commissioning lead and agrees who acts. Where we make the referral, we keep the commissioner routinely updated. Where a learner is in immediate danger or suffering, or likely to suffer, significant harm, we refer immediately without waiting for agreement. Where the concern involves the commissioner, or reporting it to them would be a conflict of interest, the DSL reports it to the LADO.

Attendance. We record attendance at every session and tell the commissioner promptly of any absence, aiming to do so within 30 minutes of the start of the session. We follow up unexplained absences urgently with parents and carers and with the commissioner.

Behaviour and incidents. We report significant incidents, including any use of physical intervention, to the commissioner and to parents or carers promptly, ideally on the same day.

Regular review. We review attendance, behaviour and progress with commissioners at least every six weeks.

Assurance about our staff. On request, we give commissioners written confirmation that appropriate safeguarding checks have been made on everyone working with their learners, and we tell them promptly when the staff working with their learners change.

If a concern is not acted on. We make sure learners, parents and carers, and staff know that if they believe a concern is not being, or will not be, acted on, they can go directly to the commissioner or to the local authority's children's social care.

7. Responding to a concern about a child

7.1 Immediate danger

If a child is in immediate danger or needs urgent medical help, call the emergency services on 999 first, then tell the DSL.

7.2 When a child tells you something

Listen calmly and without judgement. Do not investigate, ask leading questions or promise to keep a secret. Explain that you will need to tell the DSL so that the right people can help. Write down what was said in the child's own words, as soon as possible.

7.3 Recording and reporting

Whatever the level of concern, staff must record it factually on our safeguarding recording system on the same day and report it to the DSL on the same day, or immediately if there is any risk to a child. Concerns can also be raised anonymously, in writing, to the COO. Every concern is recorded, including those that are resolved or where no further action is taken.

7.4 What the DSL does

The DSL gathers the relevant facts, consults the commissioner, and decides on the right response, which may include:

- pastoral support and monitoring within our provision;
- family help or early help from the local authority where the child lives;
- a referral to children's social care through the front door of the local authority where the child lives, following the published procedures of the safeguarding partners for that area;
- a referral to the police where a crime may have been committed; and
- involving other agencies, such as health services or Prevent partners.

Referrals are made immediately where a child is suffering, or likely to suffer, significant harm. The DSL gives clear, factual information and expects children's social care to decide on next steps within one working day. If the outcome is not confirmed promptly, the DSL follows up. If the DSL disagrees with a decision, they use the escalation route in the local safeguarding partners' procedures.

7.5 Parents and carers

We normally tell parents and carers about a concern, having agreed the approach with the commissioner, unless doing so could put the child at risk, or interfere with an investigation by the police or children's social care.

7.6 Keeping the concern under review

The DSL keeps each concern under review, watches for patterns over time (including small concerns that build into a larger picture), tells the commissioner of any change, and escalates if the risk increases.

8. Specific safeguarding issues

Staff are trained to recognise the four categories of abuse and neglect (physical abuse, emotional abuse, sexual abuse and neglect) and the specific issues described in Part One of KCSIE. We do not repeat those definitions here. Any concern on these matters goes to the DSL on the same day. What follows is what we do in practice.

Child-on-child abuse

This includes bullying and cyberbullying, prejudice-based bullying and harassment (including racism and faith-based prejudice), sexual violence and sexual harassment, and harmful sexual behaviour. We never treat it as banter or as a normal part of growing up, and we do not accept or condone misogyny or misandry. The DSL assesses the risk to every child involved, including the alleged perpetrator, informs the commissioner and, unless it would increase risk, parents and carers, involves the police or children's social care where required, and makes sure all children involved are supported.

Nudes and semi-nudes, including AI-generated images

Any concern about nudes or semi-nudes involving a child, including images that are AI-generated or digitally altered, is a safeguarding incident. Staff must not view, copy, forward or delete the images unless the DSL instructs them to. They must report to the DSL immediately. The DSL assesses the risk, considers whether the incident involves an adult, coercion or blackmail, involves the commissioner, the police and children's social care where needed, supports the child, and uses national image-removal services where appropriate.

Extra-familial harm and exploitation

This covers criminal and sexual exploitation, county lines, gang involvement, serious violence (including carrying or using weapons), and trafficking and modern slavery. Signs can include unexplained gifts or money, changes in friendships, unexplained injuries, repeated missed sessions, and repeatedly going missing or absconding (see section 13 of our Behaviour Policy). The DSL consults the commissioner and uses the exploitation referral routes of the local safeguarding partners.

Radicalisation and extremism

Staff report any concern that a learner may be drawn into extremism to the DSL. The DSL consults the commissioner and Prevent partners in the local area, and may make a Prevent referral, which can lead to support through the Channel process. We support open and safe discussion of difficult issues in sessions, and we challenge prejudice and extremist views wherever they arise.

Domestic abuse

Children are harmed by seeing, hearing or experiencing the effects of domestic abuse, as well as experiencing it in their own relationships. Where a commissioner or the police share a domestic abuse notification, it goes only to the DSL. A notification supports a learner's welfare but does not replace a safeguarding referral.

Female genital mutilation, so-called honour-based abuse and forced marriage

Staff report any concern to the DSL immediately and must not contact the family. Where it is discovered that female genital mutilation appears to have been carried out on a girl under 18, it must be reported to the police in line with the statutory duty, which applies personally to the person who makes the discovery as well as to the DSL. We do not tell parents or carers before a referral is made.

Absence, mental health, private fostering and substance misuse

- Unexplained or persistent absence can be a sign of abuse, neglect or exploitation. Section 6 sets out how we follow up absences.
- Staff do not diagnose mental health conditions. A mental health concern that is also a safeguarding concern goes to the DSL on the same day, and the DSL consults the commissioner and health services.
- Staff who learn that a child is being cared for by someone who is not a close relative for 28 days or more tell the DSL, who informs the local authority, because this may be private fostering.
- Substance misuse by a learner or by a parent or carer is treated as a possible indicator of harm. The DSL consults the commissioner and decides what action is needed.

Behaviour and physical intervention

Our Behaviour Policy governs behaviour management, including the use of reasonable force. Any physical intervention is recorded, reported to the commissioner and to parents or carers promptly, and reviewed by the DSL for any safeguarding concern.

9. Learners who may need additional support

All staff must be alert to the increased risks faced by some learners and must make reasonable adjustments in line with the Equality Act 2010.

- Learners with special educational needs or disabilities can face additional safeguarding risks, including isolation and bullying, and can find it harder to communicate concerns. Staff must not assume that changes in behaviour, mood or injuries are caused only by a learner's needs. We provide extra training on communication strategies where necessary and make sure disabled learners know how to raise concerns and have a range of trusted adults they can talk to.
- Learners with medical conditions are supported through the individual healthcare plans and information provided by their commissioner.

- Learners who are looked-after or previously looked-after, who have a social worker, who are young carers, or who live with domestic abuse, substance misuse or parental mental ill health are known to the DSL through commissioner information, which is shared with staff only on a need-to-know basis.
- Learners who are lesbian, gay, bisexual or questioning their gender must be able to share concerns safely with trusted staff. Prejudice-based bullying is not tolerated. Where a learner is questioning their gender, or a request about social transition is raised by a learner or parent or carer, staff speak to the DSL, who consults the commissioner and follows statutory guidance.

10. Adult learners and adults at risk

We sometimes provide for adult learners aged 18 to 25 under the entitlement in their EHC plan. Adult safeguarding is governed by a different legal framework from child protection, principally the Care Act 2014 and the Mental Capacity Act 2005, and follows the Care and support statutory guidance. This means:

- We treat every adult learner as able to make their own decisions unless a capacity assessment shows otherwise. We help them understand the risks they face, decide what they want to happen, and take as full a part as possible in decisions about involving others.
- Staff report any concern about an adult learner to the DSL on the same day. The DSL considers whether the adult has care and support needs, is experiencing or at risk of abuse or neglect, and is unable to protect themselves. Unless it would increase risk, the DSL speaks to the adult, consults the commissioner, and where the criteria are met refers to adult social care of the local authority where the adult lives, following the procedures of the local Safeguarding Adults Board. Where a crime may have been committed, or there is immediate danger, the police are contacted.
- Staff are alert to forms of abuse that particularly affect adults, including financial abuse and scams, coercive control, discriminatory abuse, neglect and self-neglect.
- Where an adult lacks capacity to make a particular decision, we act in their best interests in line with the Mental Capacity Act 2005, involving the commissioner, family, carers or advocates as appropriate.
- Where adult learners and children are on the same centre or in the same session, the Head of Centre assesses the risks and adjusts supervision, seating and session plans, and parents and carers of children are told of the arrangements.
- Staff who work with adult learners receive training on adult safeguarding as part of their continuing professional development.

11. Concerns about adults working with learners

We create a culture in which every concern about an adult's behaviour towards learners, however small, is raised and dealt with, including conduct outside Enemy of Boredom that suggests a person

may pose a risk to learners. Staff are encouraged to refer themselves where they have made a mistake or found themselves in a difficult situation.

11.1 Who to tell

If the concern is about	Report it to
A member of staff, volunteer or contractor	The DSL
A DSL or Deputy DSL	The COO
The COO	The CEO
The CEO	The Chair of the Board of Directors
The Chair of the Board of Directors or any other board member	The LADO
Any person, where reporting internally or to the commissioner would be a conflict of interest	The LADO

No one is ever responsible for deciding or investigating a concern about themselves.

11.2 Allegations that meet the harm threshold

The DSL tells the COO immediately, and the COO acts as case manager, unless the COO is the subject of the concern, in which case the CEO acts. The case manager:

- discusses the allegation immediately, before any internal investigation, with the LADO for the area where the adult works, and follows the LADO's advice. Where an affected learner lives in or is placed by another local authority, the case manager also tells that learner's commissioner promptly, and the DSL refers to that authority's children's services if the learner needs protection;
- considers what is needed to protect learners straight away, including alternative arrangements or suspension, which is a neutral act and not a finding;
- tells the commissioner of any affected learner promptly, tells the police if a crime may have been committed, and, for agency or supply staff, tells the person's employer;
- informs parents and carers as advised by the LADO and keeps learners and the person concerned supported and informed as far as possible; and
- records every decision and the reasons for it.

11.3 Low-level concerns

Examples include favouritism, excessive personal contact, spending one-to-one time with a learner in a secluded area or behind a closed door, photographing learners on a personal device, sharing too

much personal information, or humiliating a learner. The DSL records every low-level concern, reviews it for patterns, and decides what management action or support is needed. If a concern, or a pattern of concerns, reaches the harm threshold, it is dealt with under section 11.2.

11.4 Referral to the Disclosure and Barring Service

We refer to the Disclosure and Barring Service where we have a legal duty to do so, including when we stop using someone's services because they have harmed, or may pose a risk of harm to, a child or adult at risk.

11.5 Learning

After every allegation or low-level concern the DSL considers whether our policies, training or practice need to change, and reports what has been learned to the COO.

12. Safer recruitment

We follow our Safer Recruitment Policy. Before anyone starts work with learners, we complete the checks that the role and statutory guidance require, including:

- an enhanced Disclosure and Barring Service check with a barred list check where the role involves regulated activity;
- identity, right to work, qualifications, employment history, references and any relevant overseas information;
- checks that the person is not prohibited from teaching or from working with children;
- a self-declaration about their criminal record and confirmation of medical fitness for the role.

At least one member of every recruitment panel has completed accredited safer recruitment training. Offers of appointment are conditional on satisfactory checks. For agency and supply staff we obtain evidence of the checks made on each named individual, not a general statement. Volunteers and contractors are risk assessed and supervised until their checks are complete.

We keep a single central record of these checks and keep it secure and up to date. On request, we give commissioners written confirmation that the checks have been made on the people working with their learners.

13. Centres, visitors and staff conduct

Centre access and supervision. Access to our centres is restricted to learners, our own staff and supervised visitors. We use controlled entry, sign-in and sign-out, and visitor procedures, and we supervise learners at arrival, departure and break times. Visitors and contractors are supervised unless they have had the appropriate checks, and are never left alone with learners.

CCTV. We use CCTV at our centres to help keep learners, staff and visitors safe. How we use it, including who can view footage and how long it is kept, is set out in our Data Protection Policy.

Off-site, community and shared venues. Before provision starts in a shared or public venue, a community location, an outdoor setting or a private home, we carry out a risk assessment that considers the needs of each learner and local factors. Learners in a non-secure environment are supervised by staff who have passed all recruitment checks, except where privacy is needed.

Staff conduct. Staff follow the Staff Code of Conduct. Staff do not spend one-to-one time with a learner in a secluded area or behind a closed door. Staff do not use personal devices to contact learners, to take photographs or recordings of learners, or to process learner data.

Images of learners. Images and recordings of learners are taken only on Enemy of Boredom devices, for a defined purpose and in line with our Data Protection Policy. Images of real learners are never uploaded to AI tools (see our AI Policy).

Learners' own devices. Rules on learners' mobile phones and other devices are set out in our Behaviour Policy.

14. Online and remote provision

We recognise that safeguarding incidents happen online as well as offline, and we address the categories of online risk identified in KCSIE. Our approach combines filtering and monitoring, staff training, teaching learners how to stay safe online, and clear reporting routes.

- Staff communicate with learners only through approved channels: Enemy of Boredom email, video calls and phone calls made through Enemy of Boredom accounts and systems, and Google Classroom. Staff do not contact learners through personal accounts, social media or personal phone numbers, and keep their own social media accounts private. Staff contact learners only during the working hours set out in the Staff Code of Conduct and only about matters relating to their provision.
- Online sessions are recorded to protect learners and staff. Recordings are handled in line with our Data Protection Policy, and staff do not make their own recordings.
- The COO is responsible for our filtering and monitoring arrangements. They are reviewed with the DSLs at least once every academic year, and after any significant change, including the introduction of a new AI tool. Staff know how to report harmful content, and content that is blocked when it should not be.
- Our AI Policy governs the use of AI. Any AI-generated sexual image of a child is a safeguarding incident, as set out in section 8.
- Learners are taught how to protect themselves online, including on chat, gaming and social platforms, and how to raise concerns.

15. Information sharing, confidentiality and records

15.1 Confidentiality

We never promise a learner that we will keep a secret. Safeguarding information is shared with staff only on a need-to-know basis, and the DSL decides who needs to know.

15.2 Sharing information about children

Data protection law does not prevent us from sharing information to keep children safe. Under the information sharing duty in section 16LA of the Children Act 2004 and its statutory guidance, we share information about a child, and about people connected to them, where it is relevant to safeguarding or promoting the child's welfare and could help another agency carry out its functions. The only exceptions are where sharing would cause the child a detriment that outweighs the benefit, or a specific legal restriction applies. Consent is not the usual basis for sharing. We rely on our legal obligations, public task or another lawful basis, as set out in our Data Protection Policy. We are open with children and families about what we share, with whom and why, unless doing so would put someone at risk.

15.3 Sharing information about adult learners

The information sharing duty applies to children, not adults. For adult learners, we consider consent and capacity first. We share information without consent only where there is a lawful basis, for example to protect life or to prevent serious harm to the adult or to others, following the Care and support statutory guidance and our Data Protection Policy. The DSL makes the decision and records the reasons.

15.4 Records

- Records are factual, dated and kept on our secure safeguarding recording system. They state the concern, what happened, the action taken, the decisions made and why, any referrals made or not made and the reasons, and follow-up.
- Only the DSLs and those who need to know can see safeguarding records.
- When a learner leaves us, the DSL passes their safeguarding records securely to the commissioner or the next provider promptly.
- Records are kept in line with our Data Protection Policy and retention schedule and are not destroyed while any inquiry or investigation is live.
- Any request from a learner or parent or carer to see safeguarding records goes to the DSL, who takes advice from our data protection lead. Each request is considered individually under data protection law, and records are not simply treated as exempt.

16. Training and induction

- **All staff** receive an induction on appointment covering this policy, the Staff Code of Conduct, the names of their DSL and Deputy DSL, and how to report a concern. All staff read and understand Part One of KCSIE and complete child protection training every year. All staff complete approved Prevent duty training on appointment and then every year. They also receive regular updates during the year, and training on online safety and AI, and information sharing.
- **Volunteers, agency staff and contractors** receive a briefing proportionate to their role, which as a minimum covers who the DSL is, how to report a concern and the Staff Code of Conduct.
- **DSLs and Deputy DSLs** complete DSL-level training and renew it at least every two years, complete approved Prevent duty training every year, and keep their knowledge up to date through regular updates.
- **Learners** receive an induction that explains who they can talk to and how to raise a concern if they do not feel safe, and are taught about safety, healthy relationships and online safety as appropriate to their age and needs.

The DSL keeps a record of all safeguarding training and reports any gaps to the COO.

17. Complaints, whistleblowing and equality

Complaints. Concerns or complaints about how we have handled a safeguarding matter can be raised with the COO or, if they concern the COO, with the CEO. They never delay any action needed to keep a learner safe.

Whistleblowing. Staff can raise concerns about safeguarding practice, or about the conduct of colleagues or leaders, without fear of detriment, following our Whistleblowing Policy. If they feel a concern is not being addressed, they can go directly to the commissioner, the LADO, children's social care or another appropriate external body.

Equality. We do not discriminate against any learner. We consider protected characteristics when making safeguarding decisions, make reasonable adjustments for disabled learners, and challenge prejudice, discrimination and harassment whenever they occur.

18. Monitoring arrangements

This policy is reviewed at least annually by the COO with the DSLs. At every review, the policy is approved by the CEO. It is reviewed sooner if legislation or statutory guidance changes, after any serious incident, or following learning from a review or a commissioner's quality assurance visit. The DSLs report to the CEO on safeguarding at least once a year.

This policy is published on our website and is available to commissioners, parents and carers, and the public on request.

19. Related policies

- Behaviour Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Data Protection Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- AI Policy