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# Safeguarding and Child Protection Policy

**Policy Title:** Safeguarding & Child Protection Policy

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**Owner:** Executive Headteacher

**Approval:** Governing Board

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# 1. Purpose and Commitment

## 1.1 Purpose

Apollo Education is fully committed to safeguarding and promoting the welfare of children and young people. Safeguarding and promoting the welfare of children means:

- Protecting children and young people from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring children and young people grow up in circumstances consistent with safe and effective care
- Taking action to enable all children and young people to have the best outcomes

This policy ensures that all members of the school community understand their safeguarding responsibilities and know how to identify, record and report concerns.

We recognise that students with Special Educational Needs and Disabilities (SEND), particularly those with Social Emotional and Mental Health needs and/or Autism Spectrum Condition (ASC), may face additional safeguarding vulnerabilities due to: Adverse Childhood Experiences, trauma, mistrust of adults, communication differences, social understanding, sensory regulation needs and the need to rely on adults to mediate their experience of the world.

## 1.2 Our Commitment

Apollo Education maintains an open and supportive environment where students feel safe to speak about concerns. We adopt a restorative and person-centered approach and ensure that students are listened to and taken seriously.

We will:

- Establish an ethos where students feel secure and are encouraged to talk
- Ensure students know there are trusted adults they can approach
- Provide early help where difficulties emerge
- Deliver a curriculum that equips students with the skills to stay safe, including online
- Take a zero-tolerance approach to sexual violence and sexual harassment
- Ensure robust filtering and monitoring systems are in place
- Work effectively with parents, carers and external agencies

## 2. Scope

This policy applies to:

- All teaching and non-teaching staff
- Governors and trustees
- Volunteers
- Contractors and visitors
- External professionals working with the school
- Students and parents

It applies to all school activities, including:

- On-site provision
- Off-site visits and residential trips
- Online learning environments

## 3. Legislation and Local Guidance

This policy is written in accordance with:

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Children Act 1989 and 2004
- Education Act 2002 (Section 175)
- Children and Families Act 2014
- Equality Act 2010
- Human Rights Act 1998

This policy reflects the safeguarding arrangements of the Buckinghamshire Safeguarding Children Partnership (BSCP). Apollo Education follows Buckinghamshire's Continuum of Need and Threshold Guidance when determining appropriate levels of intervention and works in partnership with Buckinghamshire Children's Services, health partners, police and other agencies.

## 4. Policy Statement and Principles

Apollo Education believes that every student has the right to be safe, respected, and valued. Safeguarding is everyone's responsibility, and effective safeguarding requires a whole-school approach.

We recognise that:

- Abuse can occur inside and outside of school
- Peer-on-peer abuse occurs and must be taken seriously
- Mental health difficulties can be indicators of abuse or neglect
- Students with SEND may experience additional safeguarding barriers
- Online safety is an integral part of safeguarding

We will act on any suspicion, disclosure or concern that a student is suffering or likely to suffer significant harm.

## 5. Roles and Responsibilities

### Executive Headteacher

The Executive Headteacher holds overall accountability for safeguarding and ensures that:

- Appropriate safeguarding systems are in place
- Sufficient resources and training are provided
- Low-level concerns are recorded and managed
- Allegations meeting the harm threshold are referred to the Local Authority Designated Officer (LADO)

### Designated Safeguarding Lead (DSL)

The DSL is responsible for coordinating safeguarding practices. This includes:

- Managing referrals to Children's Social Care
- Liaising with external agencies
- Maintaining secure safeguarding records
- Providing advice and support to staff
- Coordinating Early Help
- Ensuring staff training is up to date

- Overseeing online safety

A Deputy DSL supports this role and acts in the DSL's absence.

### **Governing Body**

The Governing Body ensures:

- Statutory safeguarding compliance
- Annual policy review
- A trained Designated Safeguarding Governor
- Appropriate filtering and monitoring systems
- Oversight of safeguarding data

### **All Staff**

All staff must:

- Be alert to signs of abuse and neglect
- Maintain professional curiosity
- Record concerns promptly and accurately
- Report concerns immediately to the DSL

Failure to report concerns may be treated as misconduct.

## **6. Safeguarding Procedures**

Safeguarding involves prevention, protection, support, and collaboration.

### **6.1 Identifying Concerns**

Staff should be alert to:

- Changes in behaviour or presentation
- Attendance issues
- Signs of neglect
- Indicators of exploitation

- Emotional distress or mental health concerns

For students with SEMH and/or ASC, signs may include regression, increased anxiety, withdrawal, or changes in sensory tolerance.

## **6.2 Radicalisation and Grooming**

Apollo Education recognises that safeguarding includes protecting students from the risk of radicalisation and exposure to extremist ideologies. Radicalisation refers to the process by which a person comes to support terrorism or extremist ideologies associated with terrorist groups. These may include:

- Sudden changes in behaviour, beliefs or peer group
- Use of extremist language
- Fixation on particular ideologies
- Expressing support for extremist causes
- Increased secrecy or withdrawal
- Possession of extremist materials
- Receiving unexplained gifts or money
- Being secretive about online contacts

It is important to recognise that these indicators do not necessarily mean a student is being radicalised or groomed. However, staff must maintain professional curiosity and report concerns to the DSL.

We also recognise that students may be groomed for:

- Sexual exploitation
- Criminal exploitation (including county lines)
- Radicalisation and extremist activity
- Online exploitation

Grooming can take place:

- In person
- Online through social media, gaming platforms or messaging apps
- Through peer networks
- Within family or community environments

Staff understand that grooming often involves:

- Building trust and emotional connection
- Isolating an individual from protective influences
- Providing gifts, money or status
- Gradually introducing harmful or exploitative behaviours

Apollo Education will:

- Deliver age-appropriate Prevent education through the curriculum
- Promote fundamental British values
- Encourage critical thinking and digital literacy
- Train staff to identify early signs of radicalisation
- Refer concerns through safeguarding procedures

Where concerns relate to radicalisation, the DSL will consider referral to appropriate safeguarding channels, including Prevent where appropriate, in line with Buckinghamshire procedures.

Students may be vulnerable due to:

- Social isolation
- SEND-related vulnerabilities
- Exposure to extremist narratives online
- Identity or belonging difficulties
- 

Children with SEND or social communication difficulties may be particularly vulnerable due to difficulties in recognising manipulation.

### **6.3 Child Sexual Exploitation (CSE)**

Apollo Education recognises that Child Sexual Exploitation (CSE) 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 into sexual activity:

- In exchange for something the child needs or wants (e.g. money, gifts, affection, status)
- For the financial advantage or increased status of the perpetrator
- Through violence, coercion or intimidation

CSE can:

- Occur in person or online
- Be carried out by adults or peers
- Involve grooming over time
- Happen without the child recognising it as abuse

Children aged 16 and 17 can also be victims of CSE, even if they appear to consent.

### **Indicators of CSE**

Staff should be alert to:

- Unexplained gifts, money or new possessions
- Older boyfriends or girlfriends
- Frequent missing episodes
- Staying out late or returning home distressed
- Changes in behaviour or dress
- Increased secrecy
- Online contact with unknown adults
- Sexually transmitted infections
- Self-harm or mental health deterioration

For students with SEND, indicators may present differently, including increased withdrawal, compliance with older peers, or difficulty recognising exploitation.

### **School Response**

Where CSE is suspected:

- Staff must report immediately to the DSL
- The DSL will assess risk using Buckinghamshire threshold guidance
- A referral will be made to Children's Social Care where appropriate
- Police involvement will be considered
- The child will be supported through pastoral and safeguarding plans

## 6.4 Female Genital Mutilation (FGM)

Apollo Education is aware of its statutory duty under the **Female Genital Mutilation Act 2003** and **KCSIE 2025**.

Staff must report immediately if they:

- Observe physical signs that FGM may have been carried out or is planned
- Receive a disclosure from a student or parent
- Have concerns about a student at risk

Any such concerns must be reported to the DSL without delay. If there is immediate risk, contact the police.

Staff should also be aware of the **'one-off' mandatory reporting duty** for girls under 18 in England and Wales.

Students with SEND may show non-verbal indicators such as distress, regression, or refusal of certain activities. Staff must maintain professional curiosity.

## 6.5 Responding to Disclosures

If a child discloses abuse, staff must:

- Listen calmly and without judgement
- Reassure the student
- Avoid leading questions
- Not promise confidentiality
- Record the disclosure in the student's own words
- Report immediately to the DSL

## 6.6 Reporting and Recording

All concerns must be recorded on the school safeguarding system on the same day. Records must include:

- Date, time and context
- Factual account of concern
- Actions taken

If a student is in immediate danger, staff must contact emergency services (999) and inform the DSL.

### **6.7 Referrals**

The DSL will consider:

- Whether Early Help is appropriate
- Whether a referral to Buckinghamshire Children's Services is required
- Whether police involvement is necessary

Parents will normally be informed unless doing so would increase risk.

### **6.8 Early Help**

Where concerns do not meet statutory thresholds, the school will initiate or contribute to Early Help Assessments in line with Buckinghamshire guidance.

### **6.9 Children Missing Education**

Children missing education are at greater risk of abuse and exploitation. The school will:

- Monitor attendance rigorously
- Investigate unexplained absences
- Notify the Local Authority when required
- Treat persistent absence as a safeguarding concern

### **6.10 Peer-on-Peer Abuse**

Peer-on-peer abuse may include:

- Sexual violence
- Sexual harassment
- Upskirting
- Sharing nude or semi-nude images
- Hazing or initiation violence
- Abuse in intimate relationships

All incidents are taken seriously and managed in line with statutory guidance.

## **6.11 Online Safety**

Online safeguarding includes:

- Appropriate filtering and monitoring systems
- Curriculum education on online risks
- Monitoring of online behaviour
- Addressing cyberbullying and grooming

The Governing Body reviews filtering and monitoring effectiveness annually.

## **6.12 Mental Health**

Staff understand that mental health concerns may indicate abuse or neglect. Concerns must be reported to the DSL, and appropriate support is sought.

# **7. Managing Allegations Against Staff**

Where a staff member has:

- Harmed or may have harmed a child
- Committed a criminal offence
- Behaved in a way that indicates risk
- Behaved in a way indicating unsuitability

The Executive Headteacher will contact the Buckinghamshire LADO within one working day. No internal investigation will begin without LADO advice.

If the allegation concerns the Head of Centre, the Chair of Governors will contact the LADO.

# **8. Low-Level Concerns**

Low-level concerns are behaviours inconsistent with the Staff Code of Conduct but not meeting the harm threshold.

All low-level concerns must be reported to the Executive Headteacher and:

- Recorded in writing
- Reviewed for patterns
- Managed proportionately
- Escalated if threshold is met

## **9. Whistleblowing**

Staff may raise concerns with:

- The Executive Headteacher
- The Chair of Governors
- The LADO
- The NSPCC Whistleblowing Helpline (0800 028 0285)

Staff raising genuine concerns will be protected.

## **10. Safer Recruitment**

Apollo Education operates robust safer recruitment procedures, including:

- Enhanced DBS checks
- Reference checks
- Identity verification
- Maintenance of a Single Central Register
- Safer recruitment trained panel members

## **11. Confidentiality and Information Sharing**

Safeguarding information is shared on a need-to-know basis to protect students. The school follows statutory guidance on lawful information sharing.

## **12. Monitoring and Review**

The DSL reports safeguarding data to the Governing Body.

This policy is reviewed annually or sooner if statutory guidance changes.

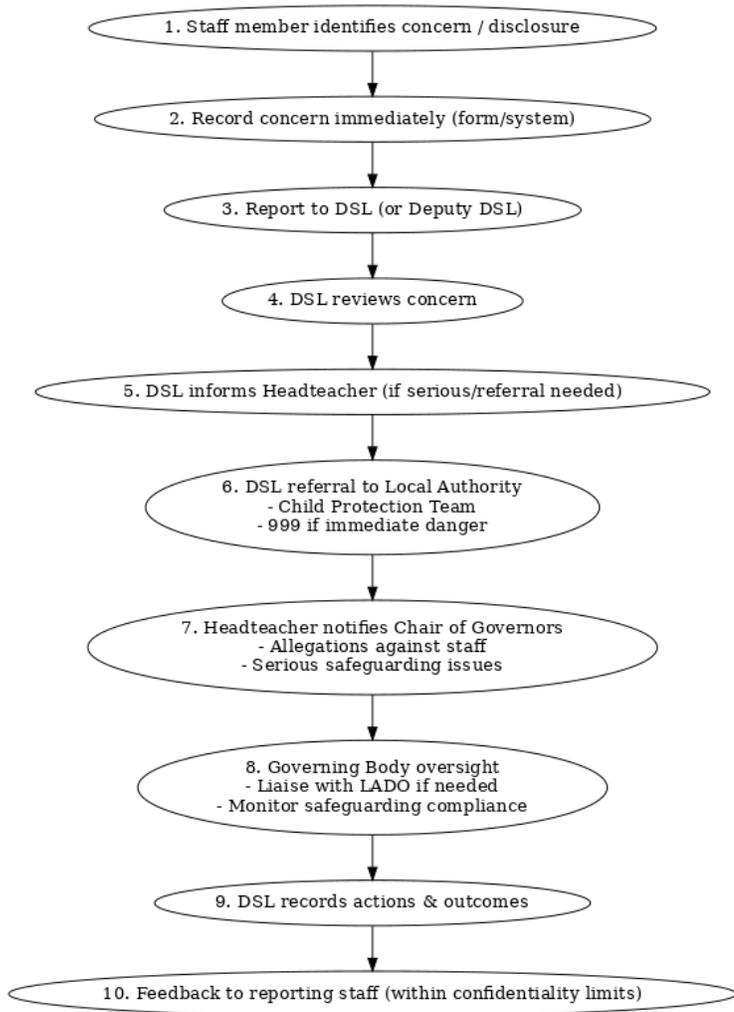
External safeguarding reviews may be undertaken where appropriate.

## **13. Linked Policies**

- Behaviour Policy
- Online Safety Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Health and Safety Policy

# 14. Approval & Sign-Off

## Annex A: Safeguarding Procedural



### Flowchart

This flowchart provides a step-by-step summary of the safeguarding and child protection process at Apollo Education. All staff should familiarise themselves with this process and follow it whenever a safeguarding concern arises.

1. Staff member identifies concern / student makes a disclosure
  - Stay calm, listen, do not promise confidentiality.

2. Record concern immediately
  - Complete safeguarding concern form or online system the same day.
3. Report to DSL (or Deputy DSL if DSL unavailable)
  - Hand over written records and provide any additional context.
4. DSL reviews concern
  - Decides on appropriate action, including whether immediate risk is present.
5. DSL informs Executive Headteacher (if serious concerns are raised or referral is required).
6. DSL makes referral (if threshold met)
  - Contact Local Authority child protection team and record actions.
  - If there is immediate danger, call 999.
7. Executive Headteacher notifies Chair of Governors if:
  - Allegations involve staff, or
  - Serious safeguarding issues require governance oversight.
8. Governors ensure oversight
  - Chair liaises with the Local Authority Designated Officer (LADO) where appropriate.
  - Governing Body monitors safeguarding compliance.
9. DSL records all actions and outcomes securely.
10. Feedback provided to reporting staff members within confidentiality limits.

## **Annex B: Definitions of Abuse**

In line with Keeping Children Safe in Education (KCSIE), the following categories of abuse must be recognised by all staff. Staff should be aware that indicators may present differently in students with SEMH, ASC or other SEND.

- Physical Abuse – may involve hitting, shaking, poisoning, burning or other physical harm.
- Emotional Abuse – persistent emotional maltreatment, conveying to a child they are worthless, unloved or inadequate.
- Sexual Abuse – forcing or enticing a child to take part in sexual activities, including online.
- Neglect – persistent failure to meet a child’s basic physical and/or psychological needs.

SEND/ASC-specific indicators may include:

- Unexplained changes in behaviour or regression in social/communication skills.
- Heightened anxiety or sensory responses linked to trauma.
- Increased withdrawal, isolation or dependency on adults.

## **Annex C: Key Safeguarding Contacts & Glossary**

### **Glossary**

15. DSL - Designated Safeguarding Lead
16. DSG – Designated Safeguarding Governor
17. LA/CPO - LA Child Protection Officer (Schools)
18. LADO – Local Authority Designated Officer (first contact for allegations against Staff and Volunteers)
19. LSCT – Local Safeguarding Children Teams
20. DBS – Disclosure and Barring Service (formally CRB)
21. YFS – Youth and Family Support

### **Key Contacts**

The following contacts must be known to all staff. This section should be updated annually and whenever key staff changes.

Designated Safeguarding Lead (DSL): Kam Badwal (Head of Centre)

Deputy DSL: Riya Varsani (Teaching Assistant)

Executive Headteacher: Nick White

Chair of Governors: Amit Varma

Local Authority Child Protection Team: [Insert contact number/email]

Local Authority Designated Officer (LADO): [Insert contact number/email]

Emergency Services: 999

NSPCC Helpline: 0808 800 5000

Childline: 0800 1111