Child Protection and Safeguarding Policy

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All adults working for Greenhouse Learning should know the name of the Designated Safeguarding Lead (DSL) for Child Protection and Safeguarding and know and follow relevant child protection and safeguarding policy and procedures. All tutors have a duty to report any child protection concerns to the Designated Safeguarding Lead (DSL) for Child Protection and Safeguarding.

This policy reflects the final September 2026 version of Keeping Children Safe in Education 2026, which came into force on 1 September 2026 and replaced the earlier information-only version.

All staff, including staff who do not work directly with children, must read Part One of Keeping Children Safe in Education 2026 in full and follow this policy and related safeguarding procedures. Staff must know the DSL and deputy DSL arrangements and how to report concerns without delay.

Principles

Greenhouse Learning recognises that children and young people accessing alternative provision may have complex safeguarding needs, including vulnerabilities associated with disrupted education, exclusion, persistent or severe absence, SEND, mental health, exploitation, serious violence and other extra-familial harms.

Greenhouse Learning recognises its legal and moral duty to protect children from harm, and respond to child abuse. Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

We believe that every child regardless of age has at all times and in all situations a right to feel safe and protected from any situation or practice that results in physical or psychological damage. We believe that safeguarding the welfare of students is of paramount importance.

Our tutors will at all times act proactively in child welfare matters, especially where there is a possibility that a child may be at risk of significant harm. It is the responsibility of every member of our community to give safeguarding the highest priority and everyone is entitled to make a referral to Children's Social Care if they believe it necessary.

Children's worries and fears will be taken seriously if they seek help from our tutors and wherever possible their confidentiality will be respected. However, tutors cannot promise confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare.

All staff will recognise that racism, faith-based prejudice and other prejudice-based harm can be safeguarding concerns.

The setting will promote an inclusive and anti-discriminatory culture in which prejudice-based and discriminatory behaviour is recognised, challenged and addressed as a safeguarding concern where appropriate.

If we have suspicions about a child's physical, sexual or emotional well-being, or that they are being neglected, we will take action.

As a consequence, we

- assert that our tutors are an integral part of the child safeguarding process and have a duty to be vigilant, putting the needs of the child first;
- accept totally that safeguarding children is an appropriate function for all tutors and staff within the organisation.
- recognise that anyone can make a referral to Children's social care
- will ensure that all tutors be alert to the possibility that a child is at risk of suffering harm, and know how to report concerns or suspicions;
- will designate a senior member of the company to act in child protection concerns. He or she will be the Designated Safeguarding Lead (DSL) and is responsible for co-ordinating action with other agencies;
- assert that if anybody believes that a child may be suffering, or may be at risk of suffering significant harm, they will always refer such concerns to the Designated Safeguarding Lead (DSL).
- will ensure through our recruitment and selection that best endeavours have been taken to ensure all tutors who we place are suitable to work with children. Greenhouse Learning will operate safe recruitment procedures including enhanced DBS checks, personal interviews and taking independent references.
- will report promptly to the Disclosure and Barring Service (DBS) any person whose services are no longer used because he or she is considered unsuitable to work with children or if they resign before we cease to employ them;
- ensure a referral to the Teacher Regulation Agency is made in cases where a prohibition order is appropriate because of 'unprofessional conduct', 'conduct that may bring the profession into disrepute' or 'a conviction at any time for a relevant offence'.
- will ensure that the directors of the company will undertake an annual review of the child protection and safeguarding policies and procedures and the efficiency with which the related duties have been discharged;

Designated Safeguarding Lead (DSL)

Safeguarding concerns must be reported to the DSL or one of the Deputy DSLs. Staff can contact the DSL and DDSLs directly and are to also use the shared safeguarding email, so if one DSL or DDSL is not available, another can pick up the concern promptly.

1. The Designated Safeguarding Lead (DSL) is:
   Rachael Tan, Director at Greenhouse Learning
   Phone: 07471123961
   Email: rach@greenhouselearning.co.uk

   The DDSLs are:
   Arfynna Shakira
   Phone: 07887 007761
   Email: hello@greenhouselearning.co.uk

   Maria Lautaru
   Phone: 07787 092942
   Email: office@greenhouselearning.co.uk

In addition to calling, safeguarding concerns are to be emailed to the shared email: safeguarding@greenhouselearning.co.uk

2. The Designated Safeguarding Lead (DSL) is key to ensuring that proper procedures and policies are in place and are followed with regard to child safeguarding issues.
3. Greenhouse Learning recognises that:
    - The Designated Safeguarding Lead (DSL) must be a senior member of the company.
    - All tutors must be aware of who this person is and what their role is.
    - The Designated Safeguarding Lead (DSL) will act as a source of advice and coordinate action over child protection cases.
    - The Designated Safeguarding Lead (DSL) will need to liaise with other agencies .
    - The Designated Safeguarding Lead (DSL) is the first person tutors report cases to. It is then the responsibility of the Designated Safeguarding Lead (DSL) to discuss the situation with the relevant agencies.
    - The Designated Safeguarding Lead (DSL) is responsible for referring cases of suspected abuse or allegations to the relevant investigating agencies according to the procedures and thresholds established by the Keeping Bristol Safe Partnership (KBSP). This can be contacting the police, referring to children's social care services, or referring to the multi-agency Families in Focus team, depending on the level of need
    - The Designated Safeguarding Lead is responsible for maintaining records of all reports of safeguarding concerns and the rationale for any decisions made.

Recruitment

In order to ensure that children are protected we will ensure that our staff are carefully selected and screened.

The company operates safe recruitment procedures in accordance with the requirements of the Disclosure and Barring service.

From 1 September 2026, the previous supervision exemption for regulated activity with children has been removed. Greenhouse will assess whether each role involves regulated activity and will obtain the appropriate DBS check, including a Children's Barred List check where legally required. This assessment will be repeated where a person's role or duties change.

In particular **before appointing any member of staff**, volunteer or contractor, the company will:

- Ensure that references are obtained and followed up.
- **Carry out an enhanced Disclosure and Barring check**
- Identify checks to establish that applicants are who they claim to be (through birth certificate, passport, driving licence etc.) and their right to work in the UK.
- Check academic qualifications to ensure that qualifications are genuine.
- Previous employment history will be examined and any gaps accounted for.
- Check the Teacher Regulation Agency to verify that they have not been barred from teaching
- Evidence of permission to work for any member of staff who is not a national of an EEA country.

Online Safety

Content Risks
Children may be exposed to harmful or inappropriate content online. In line with *Keeping Children Safe in Education* (KCSIE), this includes access to pornography, extremist or radicalising material, hate speech, and content that promotes self-harm, suicide, eating disorders, or substance misuse. From September 2025, KCSIE also highlights the risks posed by disinformation, misinformation, and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content (such as “fake news”), while misinformation is the unintentional sharing of such material (Cabinet Office, Department for Science, Innovation and Technology, 2023). Staff, mentors and pupils will be supported to recognise and respond to these risks through education, filtering, monitoring, and clear reporting routes.

Contact Risks
Children and young people may be harmed by inappropriate contact when online. This includes peer-to-peer interactions such as harassment or bullying, grooming and exploitation by adults or others, coercion, or the sharing of personal information that can lead to risk. Contact risks also cover scenarios where strangers attempt to initiate contact (e.g. via social media, forums, gaming, messaging apps) or where relationships are misused to exploit or radicalise. We will ensure that staff and mentors are alert to these risks, educate pupils about safe interactions, and have clear processes for reporting any suspicious or harmful contact.

Conduct Risks
Conduct concerns are behaviours by children or others online which may increase the risk of harm. These include cyberbullying; sharing inappropriate or indecent images; sexting; oversharing personal data; harassment or hate speech; misuse of language; using platforms in ways that breach trust or boundaries; or encouraging others to do likewise. We will promote understanding among pupils, mentors, and staff of what constitutes acceptable and unacceptable online conduct, set out clear expectations, and ensure that there are consistent consequences and support for those affected by poor conduct.

Commerce Risks
Commerce risks cover harms related to financial or commercial activity online. This might include exposure to scams, phishing attempts, inappropriate advertising or sponsorship, unregulated services, gambling, subscription traps, or in-game purchases/monetary demands that exploit vulnerabilities. Children may also be exposed to misleading marketing or be persuaded into purchasing or subscribing without understanding the risks. We will ensure that any platforms, services or content used in our provision are vetted for inappropriate commercial content, that pupils are taught to recognise and avoid such risks, and that staff monitor for and respond to commerce-related concerns.

Filtering, Monitoring & Generative AI
Given the rapid development of online tools, including generative AI, we will ensure robust filtering, monitoring and governance measures are in place. In accordance with KCSIE 2026 and the *Generative AI: Product Safety Expectations*, any generative AI products or systems used in our setting must reliably prevent pupils from generating or accessing harmful or inappropriate content. Filters should be maintained throughout interactions, adjusted for age, risk, SEND needs, and should cover all modes of content (text, image, multimodal) and across devices (including personal / BYOD). We will log activity (e.g. prompts and responses), monitor for attempts to access or generate harmful content, and set up escalation routes and supervision for when issues arise. Where platforms or tools are used, we will ensure they meet data protection and safeguarding standards. Regular review of filtering/monitoring tools and policies will be carried out to keep pace with emerging risks (new content types, AI misuse, disinformation etc.).

Staff must also be alert to AI-enabled safeguarding risks, including AI-generated or digitally manipulated sexual images, deepfakes, impersonation, grooming, coercion, harmful content and misuse of generative AI. Any safeguarding concern involving AI must be reported to the DSL. Greenhouse will review its filtering and monitoring arrangements at least annually and whenever significant changes in technology, provision or risk occur. The review will cover relevant devices, systems and locations used by pupils, including off-site or BYOD arrangements where applicable.

Further information about filtering and monitoring requirements can be found here: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

Modern Slavery

If a staff member or tutor suspects someone may be the victim of modern slavery, it must be reported through the company's safeguarding procedures and followed up by the DSL. Further information on the signs that someone may be the victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism (NRM) is available in statutory guidance on modern slavery.

Preventing radicalisation

All tutors and staff must complete Prevent Training to help them to identify children and young people who may be susceptible to radicalisation and understand the process for reporting suspicions.
As noted in KCSIE, there are 3 main aspects:
Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
There are a number of factors that may indicate concern
If staff have any concerns or suspicions, they must make a Prevent referral

Recognising Abuse

Because they are in regular and frequent contact with children, tutors are particularly well placed to observe outward signs of abuse or unexplained changes in behaviour or performance which may indicate abuse. If tutors are concerned, they should talk to the Designated Safeguarding Lead (DSL). It is also important to bear in mind that changes in behaviour can have a number of causes, such as drug or alcohol abuse. The Designated Safeguarding Lead (DSL) will seek advice from the relevant external agency when appropriate. It should also be noted that any member of staff can make a referral.

The setting will use the safeguarding definitions and terminology in the final September 2026 version of Keeping Children Safe in Education. Staff briefings, training and policy references will be updated where the final wording differs from the July 2026 information version.

Abuse can be:

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Maltreatment can be within or outside the home, including online.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Maltreatment can be within or outside the home, including online.

Racism and faith-targeted abuse: can cause significant harm to a child's welfare, safety, sense of belonging and emotional wellbeing. Staff will recognise, record and report these concerns and consider whether wider safeguarding action or support is required.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
The Lucy Faithfull Foundation has developed a Harmful Sexual Behaviour (HSB) Toolkit, which provides support, advice and information on how to prevent it, links to organisations and helpline, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse. The Lucy Faithfull Foundation has also developed Shore Space, an online resource which works to prevent harmful sexual behaviour. And the NSPCC provides free and independent advice about HSB:
https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour and:
https://learning.nspcc.org.uk/research-resources/harmful-sexual-behaviour-hsb-framework-audit
Stop it Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe and they also have a free confidential hotline.

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 occur during pregnancy as a result of maternal substance abuse. Once a child is born, 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

care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Witnessing abuse: Harm can include children witnessing the ill-treatment of others and this is particularly relevant when children see, hear or experience domestic abuse and its effects.

Specific safeguarding issues
Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk Staff can also access broad government guidance on key issues via the GOV.UK website.

Staff should be familiar with safeguarding risks including, but not limited to:

- child sexual abuse;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE), including county lines;
- gangs and serious youth violence;
- children going missing from education or home;
- bullying and cyberbullying;
- child-on-child abuse, including harassment and violence;
- harmful sexual behaviour;
- sexual harassment and sexual violence;
- sharing of self-generated intimate images and/or videos, including AI-generated or digitally manipulated images;
- domestic abuse;
- teenage relationship abuse;
- violence against women and girls;
- drugs and alcohol;
- mental health and self-harm;
- trafficking and modern slavery;
- forced marriage;
- female genital mutilation;
- radicalisation and extremism;
- online safety and technology-facilitated abuse;
- racism, faith-based prejudice and other discriminatory abuse;
- children who are questioning their gender;
- abuse or neglect associated with a child's medical needs;
- exploitation and other forms of extra-familial harm;
- fabricated or induced illness

Child Sexual Exploitation (CSE)
Child sexual exploitation is a form of child sexual abuse. It occurs where a child or young person is sexually exploited for the personal benefit or gratification of another person or group. CSE can occur through face-to-face contact, online or through a combination of both. Children may be exploited by adults or by other children and may be exploited by individuals, groups or organised networks. Exploitation may involve grooming, coercion, manipulation, threats, violence, exchange of money or other items, accommodation, drugs, status, affection or attention. A child may not recognise that they are being exploited. Staff must be alert to indicators of CSE, including changes in behaviour, relationships or peer groups; unexplained gifts, money or possessions; unexplained access to drugs or alcohol; frequent missing episodes; unexplained journeys or contact with adults or older young people; sexualised behaviour or language; online activity or contact that causes concern; or involvement in relationships where there is evidence of coercion, control or exploitation.

Staff must also recognise that there may be no obvious external signs of CSE.
Any concern that a child may be experiencing or be at risk of CSE must be reported immediately to the DSL. The DSL will consider the child's circumstances and safety, and will make appropriate referrals to children's social care, the police and/or other relevant agencies.

Child Criminal Exploitation (CCE)
Child criminal exploitation (CCE) is a form of child abuse where children or young people are manipulated, coerced or otherwise exploited to participate in criminal activity for the benefit of another person or group.

CCE can include, but is not limited to, involvement in county lines, drug supply, theft, robbery, violence, weapons-related activity, fraud, money laundering, forced criminality and other forms of organised criminal activity.

Children may be exploited by adults or by other children. A child involved in offending or criminal activity may themselves be a victim of exploitation and should not automatically be regarded solely as a perpetrator.

Staff should be alert to indicators including:

- unexplained money, gifts, phones or other possessions;
- changes in friendship groups or association with older individuals;
- unexplained travel or journeys, particularly to unfamiliar areas;
- frequent or unexplained absence from education;
- going missing or staying away from home;
- receiving multiple phones or SIM cards;
- unexplained drug use or possession;
- sudden changes in behaviour or presentation;
- increased secrecy around activities, phones or social media;
- threats, intimidation or violence;
- possession of weapons or items associated with criminal activity;
- involvement in theft, robbery, drug supply or other criminal activity;
- debt, threats or demands from other people;
- evidence that the child is being controlled, coerced or threatened.

Staff must consider whether behaviour that appears to be offending, challenging behaviour, truancy or non-engagement may be an indicator that the child is being exploited.
Any concern about possible CCE must be reported to the DSL immediately. The DSL will consider the child's immediate safety, whether there is a risk of significant harm, and whether referral to children's social care, the police or other relevant agencies is required.

Female Genital Mutilation (FGM)
Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines: https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Possible Signs of Abuse

We all need to be alert to signs and symptoms that may indicate that a young person has suffered or is suffering abuse. Many of the signs and symptoms listed below may have an alternative explanation but all are a concern – particularly if several of these occur or they are persistent:

- Unexplained bruises and injuries – particularly if these appear inconsistent with the explanation
- Untreated injuries
- Withdrawal from physical contact
- Unwillingness to undress for PE or for medical examination
- Asking to drop subjects with a particular teacher and seemingly reluctant to discuss the reasons
- Attention seeking or over compliance
- Attempted suicide / self-harm / self-mutilation
- Aggression to others / violent outbursts
- Poor peer relationships
- Inappropriate sexual remarks or behaviour
- Presence of sexually transmitted diseases
- Pregnancy
- Eating disorders
- Depression / low self-esteem / self-deprecation
- Alcohol or drug abuse
- Lying / delinquency / stealing
- Poor personal hygiene
- History of running away
- Inappropriate response to painful situations
- Overreaction to mistakes
- Reluctance to go home
- Fear of parents being contacted

Medical Conditions and Safeguarding
Greenhouse recognises that unmet medical needs can sometimes indicate neglect or other safeguarding concerns. Staff must report concerns where a child's medical needs are not being appropriately met, including repeated failure to provide essential medication or support. Medical conditions or incidents are not, by themselves, safeguarding referrals; the DSL will consider the wider circumstances and the child's welfare.

Mental Health

“There is extensive evidence that experience of childhood maltreatment can contribute to the development of a range of mental health disorders, as well as substance misuse, suicide attempts, sexually transmitted infections, risky sexual behaviour and criminality”. Transforming the mental health services for children who have been abused, NSPCC, 2017.

We recognise that mental health problems are not conducive for learning, and can disrupt family and school life. We pay attention to excessive anger, fear, sadness, anxiety or sudden changes in a child’s behaviour.

We will communicate and work with parents to ensure that interventions are in the best interests of the child.
Our DSL will also liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive outcomes.

Staff are encouraged to be aware of such signs as they observe their students during the lessons, and highlight any concerns to the Directors accordingly. Note that only trained professionals should make a diagnosis of a mental health issue.

Child-on-Child Abuse

It is important to look out for signs of child-on-child abuse (including harassment and violence) and recognise sexual harassment, sexual violence, harmful sexual behaviour, discriminatory abuse, misogyny/misandry, bullying/cyberbullying, physical violence, coercion, exploitation and sharing of nude or semi-nude images as safeguarding concerns. Concerns must be treated as safeguarding concerns and not dismissed as 'banter' or 'part of growing up'.

All staff should recognise that children are capable of abusing other children. It is important that child on child harm should be considered as a safeguarding issue.

This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

At Greenhouse Learning

- Incidents are taken seriously. These will never be tolerated or passed off as ‘banter’, just having a laugh’ or ‘part of growing up’.
- Banter and teasing can and should be acknowledged and recognised as bullying behaviour and may require proportionate intervention.
- It is understood that child on child harm may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.
- It is understood that child-on-child abuse may include discriminatory behaviour, including behaviour linked to race, faith, disability, sex, sexual orientation or gender reassignment. Staff will take concerns seriously and consider the needs and safety of all children involved.

It is important that incidents of abuse are treated under safeguarding policy and process and records will be kept on the child’s safeguarding/child protection file.

Greenhouse Learning is committed to undertaking the following:

- Early identification of vulnerability to child-on-child abuse by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- Securing the immediate safety of learners involved in an incident and sourcing support for other young people affected.
- If a disclosure is made – staff will listen carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- Those who experience abuse will never be given the impression that they are creating a problem by reporting, nor will those who experience abuse ever be made to feel ashamed for making a report.
- The child’s wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort.
- The need to not promise confidentiality should be considered as it is very likely that information will need to be shared with others.
- When an incident of sexual violence, sexual harassment or harmful sexual behaviour occurs, staff must report the concern immediately to the DSL/Deputy DSL, who will

assess the circumstances and take appropriate safeguarding action in accordance with KCSIE 2026 and current DfE guidance. These incidents must be reported immediately to the DSL/ Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified. The Brook - Sexual Behaviours Traffic Light Assessment Tool should be utilised to inform assessment of risk and what actions to subsequently take.

- It must be noted that all incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether consensual or non-consensual. Staff must not intentionally view or forward illegal images of children; staff should follow DSL advice and the current DfE guidance.
- When the children involved require a statutory assessments either under s.17 or s. 47 of the Children Act 1989 a referral to social care should be undertaken.
- Where the report includes an online element, being aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child.
- If the incident constitutes towards a criminal offence, the setting will liaise with the police. If this this may also involve the Lighthouse team (Safeguarding Unit) of Avon and Somerset Police.
- Risk assessments will be developed for individual children who have been involved in an incident. This should be reviewed every 3 months or every time there is an occurrence of an incident. These should involve the child and parents/carers.
- DSL and Deputy DSL(s) will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive outcomes.

Procedures for unexpected non-attendance

- Tutors have a responsibility to inform the Designated Safeguarding Lead (DSL) or DDSL immediately if a pupil does not attend a scheduled session without prior notice.
- The DSL or nominated staff will attempt to contact the parent/carer within 15 minutes of the missed start time.
- If no response is received within 1 hour, all emergency contacts will be tried, and the commissioning school or local authority will be notified.
- If the pupil's safety cannot be confirmed within 2 hours (or sooner for vulnerable pupils), the DSL will treat this as a safeguarding concern and will contact children's social care and/or request a police welfare check.
- All actions and communications will be logged, and the situation reviewed at the end of the working day.

Procedures for dealing with Concerns

Tutors **should not** investigate suspicions personally; if somebody believes that a child may be suffering, or may be at risk of suffering significant harm, they must first refer such concerns to the Designated Safeguarding Lead (DSL), who will refer the matter to Children's Services and involve other agencies e.g. medical services, as required. Children's Services and the Avon & Somerset Police are empowered to carry out investigations and decide whether children have been abused.

In cases where the **immediate** safety and wellbeing of the child is a cause for concern, please contact the Police on 999 **AND** also inform the Designated Safeguarding Lead (DSL) will liaise with all relevant parties/agencies to support the safeguarding of the student.

Tutors suspecting or hearing a complaint of abuse will follow the procedures below:

- Upon the receipt of any information from a child, or if any person has suspicions that a child may be at risk of harm, or
- If anyone observes injuries that appear to be non-accidental, or
- Where a child or young person makes a direct allegation or discloses that they have been abused, or
- Makes an allegation against a member of staff

they must record what they have seen, heard or know accurately at the time the event occurs, and share their concerns immediately with the Designated Safeguarding Lead (DSL) and agree action to take.

Concerns about a staff member
For any concerns raised about a staff member, the same protocol as above MUST be adhered to.

Talking and listening to children

If a child wants to confide in you, you SHOULD

- Be accessible and receptive
- Listen carefully and uncritically, at the child's pace
- Take what is said seriously but be non-judgemental
- Reassure the child that it is all right to tell
- Explain that you must pass this information on
- Remember that the child is feeling vulnerable
- Make a careful record of what was said (see below)
- Gather information on a 'need to know' basis – you do not need the whole story, just sufficient to take the next step

You MUST NOT

- Make promises about confidentiality
- Investigate or seek to prove or disprove the allegation
- Assume that someone else will take the necessary action
- Jump to conclusions, be dismissive or react with shock, anger etc
- Speculate or accuse anybody
- Investigate, suggest or probe for information – do not ask 'leading questions'
- Confront another person allegedly involved
- Offer opinions about what is being said or the persons allegedly involved
- Forget to record what you have been told
- Fail to pass this information on to the Designated Safeguarding Lead (DSL)
- Gossip about what you have been told either to colleagues or others

Recording what you have been told

Your written record should:

- Include the time, date and place of the disclosure and details of who was present
- Be in the child's words wherever possible
- Be factual
- Differentiate between fact, opinion, interpretation, observation or allegation

- Be passed on to the Designated Safeguarding Lead (DSL) immediately (certainly within 24 hours)

We will ensure that all tutors are familiar with the procedures for keeping a confidential written record of any incidents and with the requirements the Keeping Bristol Safe Partnership (KBSP).

The DSL and DDSLs will maintain a record, including a clear summary of the concern, actions taken, decisions made, the rationale for decisions and outcomes. Where a child protection file is transferred to another education setting, Greenhouse will transfer it securely and promptly in line with KCSIE 2026 and local procedures.

Information Sharing:
Data protection is not a barrier to safeguarding. Information should be shared where necessary to protect a child, on a lawful and proportionate basis. Staff should record the information shared, with whom it was shared, the decision made and the rationale. Safeguarding information should be shared with the commissioning school/local authority where required by the placement arrangement and safeguarding duties.

Levels of Harm

Safeguarding concerns exist on a continuum, ranging from low-level concerns to significant harm. It is important that all concerns are taken seriously and responded to appropriately, even when they do not meet a statutory threshold. Early identification and proportionate response can prevent escalation and reduce risk.

1. Low-Level Concerns (No Immediate Risk)

Low-level concerns are behaviours or situations that may cause unease or indicate that a child or vulnerable person may need support, but where there is no immediate risk of harm.

Examples may include:
- Minor changes in behaviour or mood
- Occasional poor attendance or engagement
- Low-level neglect (e.g. consistently inappropriate clothing)
- Boundary issues or unprofessional conduct that does not pose immediate danger

Response:
- Record the concern clearly and factually
- Share with the designated safeguarding lead (DSL)
- Monitor the situation and provide early help or support where appropriate

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2. Emerging or Moderate Harm (Early Help Required)

This level applies where concerns are persistent, cumulative, or escalating, and may indicate that a child or vulnerable person is at risk of harm without intervention.

Examples may include:
- Ongoing emotional distress or anxiety
- Frequent unexplained absences
- Signs of emotional neglect or exposure to harmful environments
- Repeated boundary concerns involving adults or peers

Response:
- Report immediately to the DSL
- Consider early help assessments or referrals to support services
- Work with relevant professionals and, where appropriate, parents or carers
- Continue to record and review concerns regularly

3.Significant Harm

Significant harm refers to situations where a child or vulnerable person is suffering or is likely to suffer serious harm. This may be due to abuse, neglect, or exploitation.

Examples may include:

- Physical, sexual, or severe emotional abuse
- Serious neglect affecting health or development
- Exploitation (including criminal, sexual, or online)
- Exposure to domestic abuse

Response:

- Report immediately to the DSL
- The DSL must make a referral to the appropriate statutory safeguarding agency
- Do not attempt to investigate or question beyond necessary clarification
- Maintain confidentiality and accurate records

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4. Immediate Danger or Critical Harm

This level applies where there is an immediate risk to life or safety.

Examples may include:

- Serious injury or threat of serious injury
- Immediate risk of abuse or abduction
- Disclosure of ongoing abuse where the person is not safe

Response:

- Contact emergency services immediately
- Inform the DSL as soon as possible
- Take immediate action to ensure safety
- Record actions taken as soon as it is safe to do so

Low level concerns

A low-level concern is any concern that an adult has acted in a way that:

is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
doesn't meet the threshold of harm or is not considered serious enough for the company to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

inadvertent or thoughtless behaviour
behaviour that might be considered inappropriate depending on the circumstances
behaviour which is intended to enable abuse.

Examples of such behaviour could include:

being over friendly with children
having favourites
adults taking photographs of children on their mobile phone
engaging with a child on a one-to-one basis in a secluded area or behind a closed door
using inappropriate sexualised, intimidating or offensive language.

Reporting a low-level concern

To report a low-level concern, staff are to follow the company's Whistleblowing Policy, including what to do if the concern is related to the DSL or the Line Manager. The Whistleblowing Policy is detailed here below:

Whistleblowing Policy
Employees are encouraged to report any suspected unethical or illegal conduct. Reports can be made to the employee's immediate supervisor or to Rachael or Chin Tan, Company Directors.

1. Employees who make a report in good faith will not be subject to retaliation. Retaliation includes, but is not limited to, demotion, termination, harassment, or discrimination.
2. Confidentiality will be maintained to the extent possible, but the company may need to disclose the identity of the whistleblower to law enforcement or other relevant parties.
3. The company will conduct an investigation into the report, and appropriate action will be taken, including referral to the Local Authority Designated Officer (LADO), as detailed later in the document.
4. The whistleblower will be informed of the outcome of the investigation, to the extent allowed by law.

Procedure:
1. Report suspected unethical or illegal conduct to the employee's immediate supervisor, or one of the Directors, Rachael or Chin Tan.
2. If the concern is about Rachael or Chin Tan, it is to be reported to any relevant authorities, such as the LADO, as detailed later in the document.
3. Provide as much detail as possible, including dates, names, and any supporting evidence.

Response to low level concerns

The directors of the company will fully investigate any low-level concerns raised against staff members, and appropriate action will be taken based on the results of the investigation.

Depending on the results of the investigation and the seriousness of the concern, the staff member may then be subject to the company's disciplinary procedures and may be asked to leave. A report may also be made to statutory agencies such as the police and/or the local authority child protection service, such as the Local Authority Dedicated Officer (LADO).

Harm Test

A harm test will be carried out, to establish if there is a risk of significant harm to the child.

With reference to the NSPCC definition of harm:
"Harm" is the "ill treatment or the impairment of the health or development of the child" (Section 31, Children Act 1989).

Seeing or hearing the ill-treatment of another person is also a form of harm (Section 120, Adoption and Children Act 2002).

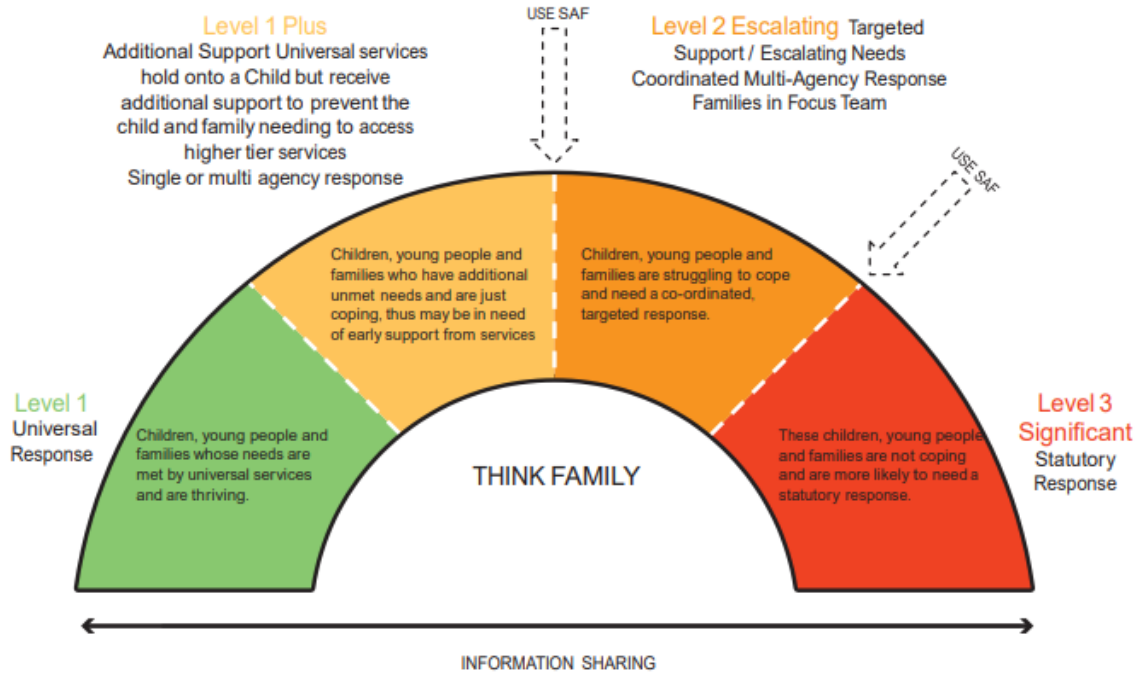
Harm can be determined “significant” by “comparing a child’s health and development with what might be reasonably expected of a similar child”.

Although there is no absolute criteria for determining whether or not harm is “significant”, local authorities such as social services, police, education and health agencies work with family members to assess the child, and a decision is made based on their professional judgement using the gathered evidence.

If it is decided that there is serious risk of harm to the child, a referral must be made immediately, using the process below in the section: Local arrangements for safeguarding.

Action by the Designated Safeguarding Lead (DSL)

Bristol’s local arrangements for safeguarding is governed by 3 Levels of Need with a Step in and Step Out approach. These are different threshold levels for intervention



- If the DSL judges that the child is in immediate danger, he should contact the police on 999 without delay

- For other child protection concerns, the DSL shall make a referral to Bristol First Response, by calling: 0117 903 6444 or the emergency duty team out of hours: 01454 615165 and also contact the non-emergency Police helpline on 101.
  We stand ready to participate in any subsequent Child Protection Enquiries in accordance with Section 47 of the 1989 Children Act

- For other child welfare and safeguarding concerns, the DSL shall make a professional judgement on the Level of Need (1, 1 plus, 2, or 3) depending on the nature and seriousness of the concern. The DSL might phone up the First Response team on 0117 903 6444 for consultation and advice where required.

- If a judgement is made that the concern is significant (Level 3), then the DSL shall make a referral to Social Care services (safeguarding response) via the First

Response tel no: 0117 903 6444 or the emergency duty team out of hours: 01454 615165.

- If a judgement is made that the concern is Escalating (Level 2), then the DSL shall first consult with the student and his/her family to agree whether a referral should be made to the Families in Focus team. This is an inter-disciplinary team that includes Social Workers, Family Support Workers, CAMHS, Family Intervention Keyworkers, Adult, Mental Health, Domestic Abuse Advocates, DWP advisors, Youth Workers, Parenting Specialists and other commissioned services that will offer support.

  We recognise that preventative and early help responses are critical to prevent issues from escalating and children experiencing further harm. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Hence, the DSL shall take a proactive approach in identifying concerns and explaining to families who might not be aware of this early intervention offer from KBSP.

  When a referral to Families in Focus is made, the DSL and any relevant tutor shall be prepared to participate in any meetings using the **Single Assessment Framework** (SAF) tool for early help

  If a judgement is made that the concern is at Level 1, the DSL shall monitor the situation, capture it on our records, and signpost the family to universal and/or specialist services such as children's centres, parenting programmes, SEN services etc

We will always take into account and respect:

- the wishes of the student affected by the safeguarding concern, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student's wishes

- the wishes of the individual's parents, provided they have no interest which is in conflict with the student's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead (DSL) is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose

- duties of confidentiality, so far as applicable.

Where a safeguarding concern or allegation relates to an adult working for or on behalf of Greenhouse, the concern must be reported to the appropriate senior person and managed under Part 4 of KCSIE 2026. The LADO must be consulted where the harm threshold may be met. The setting will cooperate fully with any LADO, police or children's social care process.

If he judges there to be a case against the staff member, a referral shall be made to the LADO (Local Authority Designated Officer) for a full investigation. This may result in a police investigation, employer disciplinary action and/or being placed on the Children's barred list.

For any initial referral made by telephone, the Designated Safeguarding Lead (DSL) will confirm the referral in writing to social services within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead (DSL) will contact social services again.

Whether or not Greenhouse Learning decides to refer a particular complaint to social services or the police, the parents and student will be informed in writing.

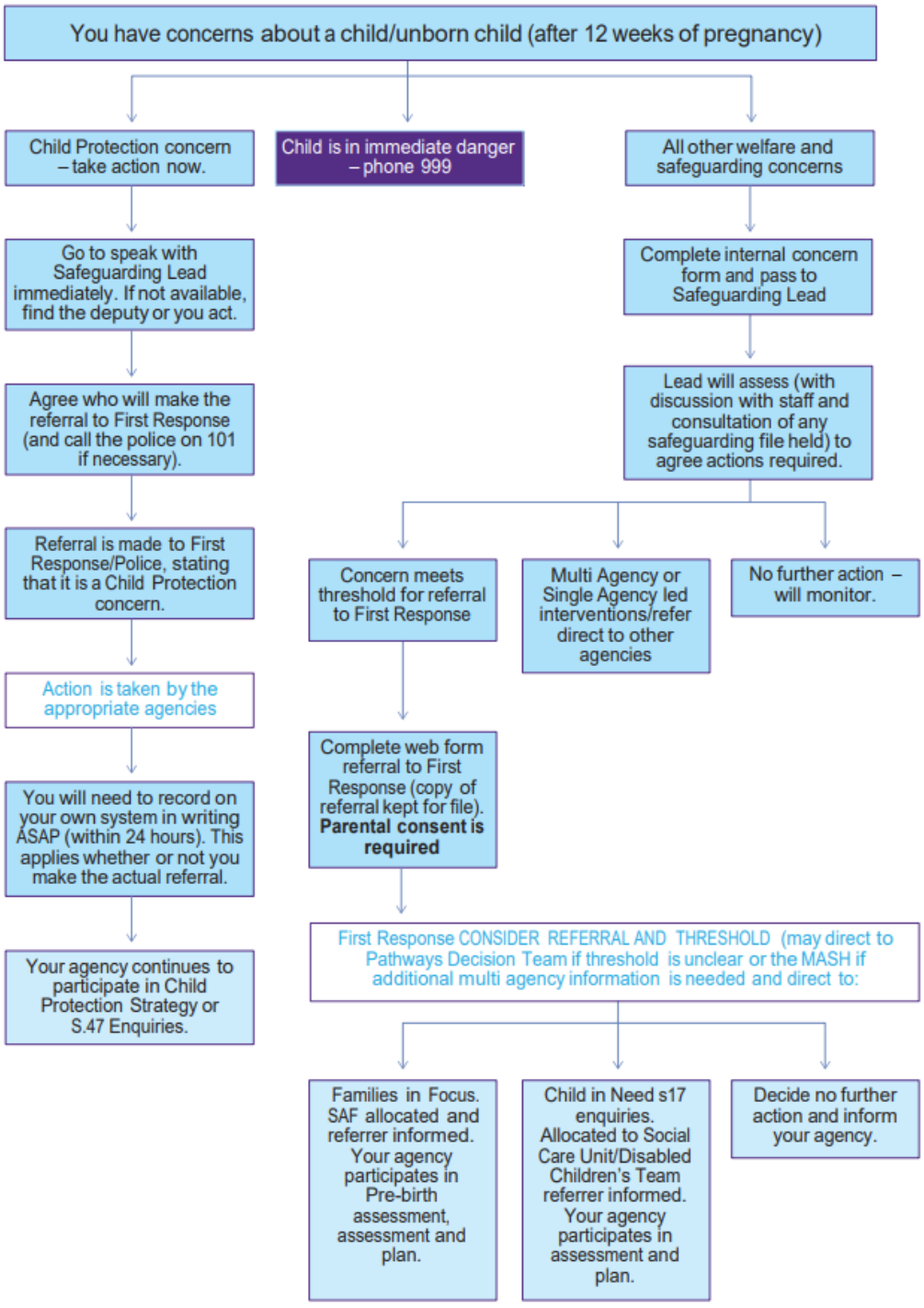
Referral

Anyone within our organisation can raise concerns and suggest a referral to social services. We ask that this action is discussed and agreed with Rachael Tan, our Designated Safeguarding Lead. For children living in Bristol, referrals are made via the link below

https://www.bristol.gov.uk/residents/social-care-and-health/children-and-families/concerns-about-a-child

Decision chart on actions to be taken by Designated Safeguarding Lead in response to concerns

Appendix 1 Referral to Children's Social Care



Once a referral is made, all staff should expect to be available in supporting social workers and other agencies in their statutory assessments

Confidentiality

All tutors will ensure that all data about students is handled in accordance with the requirements of the law, and any national and local guidance.

Any tutor who has access to sensitive information about a child or the child's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know.

Regardless of the duty of confidentiality, if any tutor has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Designated Safeguarding Lead (DSL) for child protection.

All child protection concerns are recorded and stored securely by the Designated Safeguarding Lead (DSL) for child protection.

Conduct of Staff

Greenhouse Learning has a duty to ensure that professional behaviour applies to relationships between tutors and students, and that all tutors are clear about what constitutes appropriate behaviour and professional boundaries.

At all times, tutors are required to work in a professional way with students. All tutors should be aware of the dangers inherent in:

- Working alone with a child
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Disclosing personal details inappropriately
- Meeting students outside tutoring hours or tutoring duties

Tutors should be aware of the situations in which their actions have the potential to be misinterpreted and which might then give rise to child-protection concerns. Tutors should exercise particular care in settings of the following nature:

  - The giving of gifts
  - Students in distress
  - One-to-one situations
  - Use of photography and other electronic media, including ICT.
  - Particular caution should be exercised with social networking sites

Tutors should:

- Understand the responsibilities which are part of their role and be aware that appropriate sanctions will be applied where these are breached
- Always act and be seen to act in the child's best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Take responsibility for their own actions and behaviour
- Be open to advice and feedback from colleagues
- Always report any child protection concerns to the appropriate person
- Act in a professional manner treating all students fairly and with respect

Tutors should NOT

- Use their position to gain access to information for their own advantage and/or a child's or family's detriment
- Use their power to intimidate, threaten, coerce or undermine students
- Use their status and standing to form or promote relationships with children which are of a sexual nature or which might become so

Where no specific guidance exists about particular situations or where staff are worried about how their actions might be interpreted they are advised to:

- Discuss the circumstances that informed their action or proposed action with the Designated Safeguarding Lead (DSL) for child protection. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted
- Always discuss any misunderstandings, accidents or threats with the Designated Safeguarding Lead (DSL)
- Always keep a record of discussions and actions taken

All tutors must understand that an allegation that they have assaulted a child, or placed a child at risk of harm will be a multi agency matter, involving the Police and Children's Services.

Mobile Phones and Personal Devices

Greenhouse will maintain clear arrangements for pupil and staff use of mobile phones and personal devices. Any use of a device that creates a safeguarding concern – including filming, sharing harmful or sexual content, contact with unsafe adults, exploitation, threats, bullying or sharing nude/semi-nude images – must be reported to the DSL and managed under the relevant safeguarding procedures. Staff must follow current DfE guidance and must not intentionally view or forward illegal images of children.

Children questioning their gender

Greenhouse Learning recognises that some children may question their gender and that individual children may require sensitive and careful support.

The welfare and safeguarding of the child remain the primary considerations. Staff should respond sensitively, respectfully and without making assumptions about the child's circumstances, while recognising that a child questioning their gender may have other safeguarding or wellbeing needs.

Staff should be alert to safeguarding concerns that may arise in relation to a child who is questioning their gender, including bullying, harassment, abuse, discrimination, online abuse, self-harm, mental health concerns and family conflict.

Where a child raises concerns about their gender or asks for support, staff should listen appropriately, avoid making promises of confidentiality, and inform the DSL where there is a safeguarding concern or where the circumstances require further consideration.

The setting will consider the individual circumstances and best interests of the child and, where appropriate, involve parents or carers and relevant professionals. Information will be shared in accordance with safeguarding and information-sharing requirements.

Any concern that a child may be at risk of harm, abuse, self-harm or other significant safeguarding concerns will be managed through the setting's normal safeguarding procedures.

Where decisions concerning a child who is questioning their gender involve safeguarding considerations, the DSL will ensure that appropriate advice is sought and that the child's welfare, safety and individual circumstances are properly considered.

FURTHER INFORMATION

Children's Services (Bristol City Council) First Response: **Call 0117 9036444**

https://www.bristol.gov.uk/social-care-health/first-response-referral

NSPCC - 0808 800 5000

Keeping Bristol Safe Partnership: https://bristolsafeguarding.org/

Keeping Bristol Safe Partnership Procedures:

https://bristolcs.trixonline.co.uk/

Keeping Bristol Safe Partnership Effective Support for Children and Families

https://bristolsafeguarding.org/media/udojgxw1/effective-support-for-children-and-families.pdf

Keeping Bristol Safe Partnership Continuum of Need Support

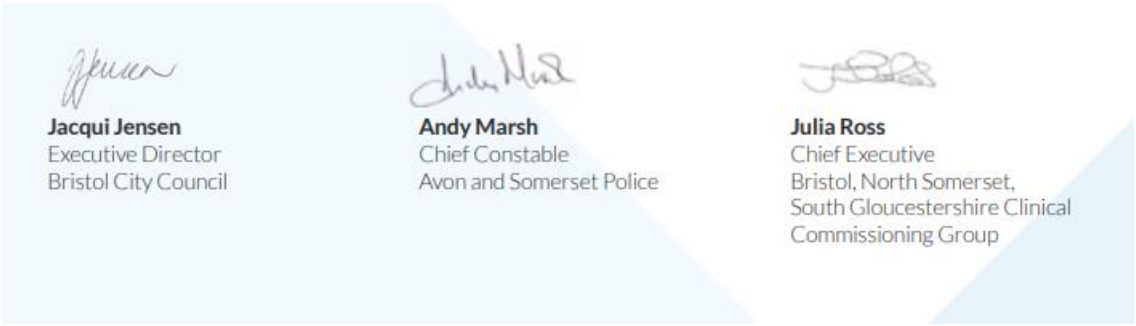
https://bristolsafeguarding.org/media/bjzbufqb/bnssg-contonuum-of-need-support-framework-for-children-and-families.pdf

Local arrangements in Bristol: https://bristolsafeguarding.org/media/42653/keeping-bristol-safe-parthership-local-arrangements-2019-20.pdf

LADO leaflet: https://national-lado-network.co.uk/wp-content/uploads/2022/10/South-West-LADO-leaflet-for-employers-V1-Oct-2020.pdf

The "Three safeguarding partners" have equal and joint responsibility for local safeguarding arrangement. Within Bristol, they are:

Executive Director – People Directorate	Bristol City Council
Chief Executive Officer	Bristol, North Somerset, South Gloucestershire Clinical Commissioning Group (BNSSG)
Chief Constable	Avon and Somerset Police



Jacqui Jensen
Executive Director
Bristol City Council

Andy Marsh
Chief Constable
Avon and Somerset Police

Julia Ross
Chief Executive
Bristol, North Somerset,
South Gloucestershire Clinical
Commissioning Group

Priority safeguarding contacts		
If you have concerns about a child/young person in Bristol		
If a child is at immediate risk call the police.	**POLICE – 999**	
To make a referral where a child is likely to suffer, or is suffering, significant harm, call children's social care.	**FIRST RESPONSE – 0117 903 6444**	
Out of hours referrals.	**EMERGENCY DUTY TEAM – 01454 615 165**	
Mental health crisis support, 24 hours a day, 7 days a week.	**Bristol Mental Health – 0300 555 0334**	
To raise concerns and ask for advice about radicalisation. Also contact First Response where appropriate.	**PREVENT DUTY – 01278 647466 PreventSW@avonandsomerset.police.uk**	
To liaise with the specialist safeguarding police unit.	**Lighthouse Safeguarding Unit (Avon and Somerset Police) – 01278 649228 LighthouseBristol@avonandsomerset.police.uk**	
For advice and guidance about whether to make a referral.	**Family Help**	
South 0117 903 7770	**East Central 0117 357 6460**	**North 0117 352 1499**

If you have concerns about a professional working with a child		
To raise concerns and ask for guidance in relation to the conduct of someone who works with children.	**Local Authority Designated Officer (LADO) T: 0117 903 7795 KBSP LADO notification form**	
For information, advice and guidance in relation to safeguarding policy and procedures		
Safeguarding in Education Team T: 0117 922 2532 E: Safeguardingineducationteam@bristol.gov.uk		
South Advisor Helen Macdonald helen.macdonald@bristol.gov.uk 0117 922 2533	**East Central Advisor Elizabeth Male Elizabeth.male@bristol.gov.uk 0117 922 2532**	**North Advisor Colin Clements Colin.clements@bristol.gov.uk 0117 922 2532**

OTHER LOCAL AUTHORITY CONTACTS

Local Authority in which the child is resident	Contact details	Out of hours/ Weekend
South Gloucestershire	Access and Reponses Team T: 01454 866000 - Monday to Thursday 9.00 – 5.00, 4.30 on Friday E: accessandresponse@southglos.gov.uk W: Access and Response Teams (ART) | South Gloucestershire Council (southglos.gov.uk)	Emergency Duty Team 01454 615165
North Somerset	Single Point of Access T: 01275 888 808 –Monday-Thursday 8.45am-5pm, Friday 8.45am-4.30pm W: Children, young people and families | North Somerset Council (n-somerset.gov.uk)	
Bath and North East Somerset (BANES)	Children's Social Work Services	

	T: 01225 396312 or 01225 396313 **Mon-Thurs 8:30am to 5pm, Friday 08:30-4:30pm** **E: ChildCare_Duty@bathnes.gov.uk** **W:Report a concern about a child | Bath and North East Somerset Council (bathnes.gov.uk)**	

Child Protection and Safeguarding Policy
Keeping Children Safe in Education: Information for all tutors and staff log

All adults working in Greenhouse Learning should know the name of the Designated Safeguarding Lead (DSL) for Child Protection and Safeguarding and know and follow relevant child protection and safeguarding policy and procedures. All staff have a duty to report any child protection concerns to the Designated Safeguarding Lead (DSL) or one of the Deputed Designated Safeguarding Leads for Child Protection and Safeguarding. Any safeguarding concerns are to be sent to: safeguarding@greenhouselearning.co.uk

I acknowledge receipt of a copy of the Greenhouse Learning Child Protection and Safeguarding Policy. I confirm that I have read their contents and will abide by them. I understand my commitment to the protection and safeguarding of children at Greenhouse Learning as detailed in the paragraph above.

I will attend Child Protection and Safeguarding Training as required by Greenhouse Learning.

Name:

Signed:

Date:

Please acknowledge you have read this policy online -
https://greenhouselearning.typeform.com/to/hBeUKRDi