



SB Mentoring

Offering a foundation for future success

Safeguarding and Child Protection Policy 2026-27



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DSL	Louiza Manager	Deputy DSL	Maria Williams Zoe Phillips

KCSIE 2026 Update Summary

This policy replaces the previous 2025-26 safeguarding and child protection policy. It has been expanded from a brief overview into a full operational policy for SB Mentoring as an Alternative Provision, reflecting statutory safeguarding expectations and the 2026 updates to Keeping Children Safe in Education. **Staff must read KCSIE Part One in full.**

- **KCSIE status and scope:** References have been updated to Keeping Children Safe in Education 2026, which comes into force from 1 September 2026.
- **All-staff reading:** The former condensed Annex A approach has been removed; all staff are expected to read Part One in full.
- **Early help and Family Help:** Language has been updated to include universal services, community-based early help, targeted early help and Family Help.
- **Online safety:** The policy now includes generative AI, AI-generated nude or semi-nude images, deepfakes, livestreams, online coercion, cybercrime and harmful online content.
- **Filtering and monitoring:** The policy now includes annual review expectations, checks on all relevant internet-connected devices and record-keeping.
- **Child-on-child abuse:** The policy has been strengthened to include harassment, violence, harmful sexual behaviour, serious physical harm, threats involving weapons, misogyny and misandry.
- **CCE, CSE and modern slavery:** The policy includes exploitation by individuals, gangs or organised networks and recognises that victims may be criminalised through coercion.
- **Mental health and trauma:** The policy has been updated to include trauma-informed safeguarding responses and links between safeguarding, welfare and educational outcomes.
- **Alternative Provision:** The policy includes commissioning school responsibilities, written safeguarding assurances, transition arrangements and off-site/outreach safeguarding.
- **Safer recruitment:** Regulated activity, volunteers, trainee teachers and work experience supervision have been updated to reflect 2026 changes.
- **LGB and gender-questioning children:** The policy includes a case-by-case safeguarding approach, privacy, dignity, equality considerations and careful information sharing.
- **Sport, premises and mobile phones:** New sections cover safeguarding in sport, premises requirements, mobile phone expectations and information security.
- **Reasonable force/restrictive intervention:** The policy requires reasonable, necessary, proportionate, recorded and reviewed practice.

1. Purpose and Safeguarding Statement

SB Mentoring recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and young people accessing its provision. We are committed to creating a culture where safeguarding is everyone's responsibility, concerns are acted on promptly, children are listened to, and professional curiosity is expected from all staff.

- protecting children from maltreatment, including online and offline harm;

- preventing impairment of children's mental and physical health or development;
- ensuring children grow up and learn in circumstances consistent with safe and effective care;
- enabling children to have the best outcomes, including educational and social outcomes;
- providing a safe, nurturing, trauma-informed and inclusive alternative provision environment.

Safeguarding at SB Mentoring includes child protection, early help, attendance, behaviour, mental health, online safety, safer recruitment, allegations management, safe premises, safe activities, safe use of technology, and effective information sharing.

2. Scope

This policy applies to all students, including pre-16, post-16 and post-18 learners where statutory safeguarding duties continue to apply to children under 18. It applies to all staff, volunteers, contractors, visitors, trustees/advisory board members, agency staff, trainee teachers, work experience supervisors, external tutors and partner providers.

It applies to all SB Mentoring activity including Calne provision, Rowde @TheBarn provision, outreach, home/community work, mentoring, transport arrangements, educational visits, vocational learning, construction, catering, enterprise, IT, sport, photography, fitness, work-related learning and online learning.

3. Legal and Statutory Framework

- Keeping Children Safe in Education 2026 (statutory guidance, in force from 1 September 2026);
- Working Together to Safeguard Children;
- Children Act 1989 and Children Act 2004;
- Education Act 2002, Section 175 where applicable;
- Counter-Terrorism and Security Act 2015 and Prevent Duty guidance;
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- Equality Act 2010, Human Rights Act 1998 and Public Sector Equality Duty where applicable;
- Sexual Offences Act 2003, Female Genital Mutilation Act 2003 and Modern Slavery Act 2015;
- Relevant local safeguarding partner procedures and Wiltshire safeguarding arrangements.

4. Safeguarding Roles and Contacts

Role	Name	Responsibilities
Designated Safeguarding Lead (DSL)	Louiza Bruce, Manager	Lead safeguarding practice, referrals, records, training oversight, safer culture and liaison with agencies.
Deputy DSL	Maria Williams	Support DSL duties, cover during absence, advice to staff and safeguarding records.
Deputy DSL	Zoe Phillips	Support DSL duties, cover during absence, advice to staff and safeguarding records.
Advisory Board / Safeguarding Governance	Kirsty Burrige / Advisory Board	Scrutiny, challenge, policy approval and safeguarding oversight.
All staff and volunteers	All adults working with students	Read KCSIE Part One, identify concerns, report immediately, record accurately and maintain professional boundaries.

A DSL or Deputy DSL will be available during provision hours. When the DSL is unavailable, staff must contact a Deputy DSL. SB Mentoring will maintain robust cover arrangements and may use a confidential safeguarding email or recording system so that urgent concerns are not delayed.

5. Responsibilities of All Staff

All staff must maintain an attitude of “it could happen here”. Staff must never assume that another professional has taken action. Concerns must be shared with the DSL or Deputy DSL immediately, even where information is incomplete or the concern appears low level.

- Read and understand this policy, staff code of conduct, behaviour policy, attendance procedures, online safety policy and KCSIE Part One.
- Complete safeguarding induction before working unsupervised with learners and complete annual refresher training.
- Recognise indicators of abuse, neglect, exploitation, mental health concerns and online harm.
- Know how to make a referral to children’s social care or emergency services if a child is at immediate risk and the DSL is unavailable.
- Record concerns factually, using the child’s own words where possible, with date, time, location and action taken.
- Preserve confidentiality but never promise secrecy to a child.
- Challenge inappropriate behaviour, discriminatory language, misogyny, misandry, sexualised behaviour, racism, homophobia, biphobia, transphobia, ableism or harassment.

6. Early Help, Family Help and Professional Curiosity

SB Mentoring recognises the importance of early identification and support. Staff should be alert to emerging needs and patterns, including attendance changes, anxiety, behaviour changes, family stress, exploitation risk, social isolation, caring responsibilities, substance misuse, domestic abuse, homelessness, temporary accommodation, poverty, online harm or deterioration in mental health.

Where a child may benefit from universal services, community-based early help or targeted Family Help, the DSL will consider the most appropriate response in line with local thresholds. Staff should share information promptly so the DSL can consider whether internal support, consultation, Early Help/Family Help, a social care referral, police action or another pathway is required.

7. Categories and Indicators of Abuse

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It may also include fabricated or induced illness.

Emotional abuse

Emotional abuse is persistent emotional maltreatment that causes severe and adverse effects on emotional development. It may include conveying to a child that they are worthless, unloved or inadequate; verbal abuse such as criticism, belittling or name-calling; inappropriate expectations; exploitation; isolation; bullying or seeing/hearing the ill-treatment of another.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes physical contact, assault by penetration, sexual assault, non-contact activities, involving children in looking at or producing sexual images, grooming, exploitation and online sexual abuse.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It includes failure to provide adequate food, clothing, shelter, supervision, medical care, education or emotional warmth.

8. Specific Safeguarding Issues

Safeguarding issues often overlap. A child may be experiencing more than one type of harm. Staff must be alert to the following issues and report concerns immediately:

- Child criminal exploitation (CCE), county lines and gang involvement
- Child sexual exploitation (CSE), grooming and organised abuse networks
- Modern slavery and trafficking
- Serious violence, weapons, threats and youth violence
- Domestic abuse, including child-to-parent or caregiver abuse
- Female genital mutilation (FGM), forced marriage and honour-based abuse
- Radicalisation, extremism and Prevent concerns
- Children missing education or persistently absent learners
- Mental health, self-harm indicators and trauma responses
- Substance misuse and exploitation linked to substances
- Young carers and children with caring responsibilities
- Cybercrime, hacking, online coercion and harmful online communities
- Temporary accommodation, homelessness or family instability
- Children with a social worker, children in need and children subject to child protection plans
- Care experienced children and children looked after
- Children with SEND, neurodiversity, communication needs or medical conditions

9. Child-on-Child Abuse, Harassment and Violence

Child-on-child abuse is abuse by one or more children against another child. It is a safeguarding issue for both the victim and the alleged perpetrator. It is preventable and must never be dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

- bullying, cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children;
- physical abuse, threats, violence, weapon-related threats or intimidation;
- sexual violence, sexual harassment and harmful sexual behaviour;
- causing someone to engage in sexual activity without consent;
- making or sharing nudes or semi-nudes, including AI-generated images, deepfakes and deep nudes;
- upskirting or image-based abuse;
- initiation or hazing type violence and rituals;
- misogyny, misandry, racism, homophobia, biphobia, transphobia, ableism or derogatory behaviour.

Reports will be taken seriously, recorded, risk assessed and managed in a way that protects the victim, alleged perpetrator and wider student group. SB Mentoring will consider the child's voice, wishes and feelings, but will not allow a child's reluctance to prevent appropriate safeguarding action where risk remains.

10. Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence

SB Mentoring recognises a continuum from inappropriate sexualised language or behaviour through to harmful sexual behaviour, sexual harassment and sexual violence. All incidents involving making or sharing nudes or semi-nudes require a safeguarding response, whether consensual or non-consensual.

- Ensure immediate safety and medical/police support where required.
- Reassure the child, listen carefully and avoid leading questions.
- Record the disclosure accurately using the child's own words.
- Report to the DSL immediately.
- Risk assess contact between children, including travel, groupings, online contact and provision arrangements.
- Consider referral to social care, police, Early Help/Family Help, CAMHS/mental health support or specialist sexual violence services.
- Keep decisions under review and support all children involved.

11. Online Safety, Technology and Generative AI

Online safety is part of safeguarding. SB Mentoring will protect and educate learners and staff in their use of technology and establish mechanisms to identify, intervene in and escalate online concerns.

Four areas of online risk

- **Content:** being exposed to illegal, inappropriate or harmful material including pornography, violence, misogyny, misandry, self-harm, eating disorder content, extremist material or misinformation.
- **Contact:** harmful online interaction with other users, including grooming, coercion, radicalisation, exploitation or harassment.
- **Conduct:** personal online behaviour that increases risk, including creating or sharing nudes/semi-nudes, cyberbullying, abuse, unsafe livestreaming or oversharing.
- **Commerce:** risks such as scams, gambling, financial exploitation, phishing, extortion, blackmail and sextortion.

Generative AI and image-based abuse

Staff must be alert to the use of generative AI to create, alter or share harmful content, including AI-generated nude or semi-nude images, deepfakes, deep nudes, impersonation, bullying, sexual harassment, blackmail, misinformation or grooming. Any AI-generated sexual image involving a child under 18 must be treated as a safeguarding concern and reported to the DSL immediately.

Mobile phones and personal devices

SB Mentoring will maintain clear expectations for mobile phone use. Phones must not be used to bully, film, photograph, intimidate, exploit, sexually harass, share nudes/semi-nudes, access harmful content or contact others in ways that place a child at risk. Staff must not contact students through personal devices or personal social media accounts.

12. Filtering, Monitoring and Information Security

SB Mentoring will maintain appropriate filtering and monitoring systems for devices and networks used by learners. The DSL, senior leadership and IT support will work together to make sure systems are effective and proportionate.

- Filtering and monitoring effectiveness will be reviewed at least once every academic year.
- Reviews will include checks that filtering works appropriately on all relevant internet-connected devices and in relevant locations.
- Records of checks, actions and concerns will be kept.
- Staff must report blocked-content alerts, concerning searches, attempts to bypass filters or suspected online harm.
- Staff must protect confidential information, use secure systems, lock screens, use strong passwords and report data/security incidents immediately.

13. SEND, SEMH, Neurodiversity and Medical Conditions

SB Mentoring supports learners with SEMH, ADHD and a range of additional needs. Children with SEND, neurodiversity, communication needs, health conditions or social/emotional difficulties can face additional safeguarding barriers. Staff must avoid assuming that changes in behaviour are “just part of SEND” or “just SEMH”.

- Indicators of abuse may be masked by communication, sensory, behavioural or emotional needs.
- Children may be more vulnerable to bullying, grooming, exploitation, coercion, radicalisation or online harm.
- Children may find it harder to disclose abuse or may not recognise exploitative behaviour.
- Behaviour may communicate distress, trauma or unmet need.
- Reasonable adjustments must be made so the child can be heard and understood.

Safeguarding plans should link with support plans, risk assessments, EHCP outcomes and pastoral strategies where appropriate, while ensuring confidentiality is preserved on a need-to-know basis.

14. LGB and Gender-Questioning Children

SB Mentoring will provide a safe environment for all children. Staff must be alert to bullying, harassment, sexual harassment, misogyny, misandry, homophobia, biphobia, transphobia or isolation. Decisions relating to a child who is LGB or gender-questioning will be considered case by case, taking account of safeguarding, equality, privacy, dignity, the child’s wishes and feelings, and the views of parents/carers where appropriate and safe.

Information will not be shared indiscriminately. The DSL will consider risk, consent, age, maturity, parental involvement, safety and the need for external advice. Toileting, changing and privacy arrangements must not compromise the safety, comfort, privacy or dignity of any child.

15. Attendance, Children Missing Education and Transitions

Poor attendance, persistent absence, unexplained absence and missing education can be indicators of safeguarding risk including neglect, exploitation, mental health difficulty, family stress, bullying, domestic abuse, young caring responsibilities or criminal/sexual exploitation. SB Mentoring will monitor attendance daily and follow up unexplained absence promptly.

- Commissioning schools remain responsible for pupils they place with alternative provision and must be kept informed of attendance and safeguarding concerns.
- The DSL will consider whether absence patterns require Early Help/Family Help, social care, police welfare checks or escalation to the placing school/local authority.
- Where learners transition into or out of SB Mentoring, safeguarding information will be shared securely and promptly with the relevant DSL.

16. Alternative Provision, Outreach and Off-Site Safeguarding

As an Alternative Provision, SB Mentoring works closely with commissioning schools, local authorities and families. Where a school places a child with SB Mentoring, the school continues to be responsible for safeguarding that child and should obtain written confirmation that appropriate safeguarding checks and arrangements are in place.

SB Mentoring will ensure

- clear referral and admission information, including known risks, attendance concerns and safeguarding history;
- clear communication routes with the commissioning school DSL;
- written confirmation of safeguarding arrangements where requested;
- daily attendance reporting arrangements;
- risk assessments for site-based, outreach and community activities;
- clear lone working and home/community visit procedures;
- appropriate staffing ratios and supervision;
- clear procedures for transport, collection and handover arrangements;
- safe arrangements for vocational learning, sport, trips, work-related learning and practical activities.

Outreach and home/community work

Outreach staff must follow lone working procedures, share visit details, avoid isolated or unsafe arrangements, report changes in family presentation, record concerns promptly and maintain professional boundaries. Where a visit feels unsafe, staff should leave and contact the DSL or emergency services if required.

17. Safer Working Practice and Professional Boundaries

- Staff must act professionally and maintain appropriate boundaries at all times.
- One-to-one work should take place in visible or agreed spaces where possible.
- Staff must not use personal social media, personal email or personal messaging apps to contact learners.
- Physical contact must be appropriate, proportionate, necessary and in line with the learner's needs and agreed plans.
- Gifts, favouritism, private meetings, secrecy, inappropriate humour or over-familiarity are not permitted.
- Any accidental boundary issue or concern about a colleague's conduct must be reported promptly.

18. Reasonable Force and Restrictive Intervention

SB Mentoring aims to use de-escalation, relational practice and proactive support. Reasonable force or restrictive intervention must only be used when necessary, proportionate and in the child's best interests to prevent harm, and only where less restrictive approaches have not been sufficient or would not be appropriate in the circumstances.

- incidents must be recorded and reported to the DSL/Manager;
- parents/carers and commissioning schools should be informed where appropriate;
- the child should be supported after the incident and their voice considered;
- risk assessments and support plans should be reviewed;
- staff support and debrief should be offered.

19. Safer Recruitment and Single Central Record

SB Mentoring will follow safer recruitment procedures to deter, identify and reject unsuitable adults. Recruitment panels will include safer recruitment training where possible. The organisation will maintain a Single Central Record or equivalent record of recruitment checks.

- identity checks and right to work checks;
- enhanced DBS checks with barred list information where required;
- children's barred list checks where legally permitted and required;
- references, employment history and explanation of gaps;
- qualification/prohibition checks where relevant to role;
- overseas checks where applicable;
- section 128 checks for relevant management/governance roles where applicable;
- appropriate checks and assurances for agency, contractors, volunteers, trainee teachers and visiting professionals.

KCSIE 2026 updates to regulated activity, volunteers and work experience supervision must be reflected in recruitment and visitor procedures. No adult should begin regulated activity until required checks and risk assessments are complete unless a senior leader has explicitly authorised supervised arrangements in line with statutory guidance.

20. Volunteers, Visitors, Contractors, Trainee Teachers and Work Experience

All visitors must sign in, wear identification and be supervised unless SB Mentoring has confirmed that required checks and risk assessments are complete. Contractors must be managed so they do not have unsupervised access to children unless appropriate checks and arrangements are in place.

Volunteers, trainee teachers and work experience supervisors must be assessed carefully. The DSL/Manager will determine the level of supervision, checks and induction required. Safeguarding concerns about these adults will be handled in line with the allegations and low-level concerns procedures.

21. Allegations Against Staff and Low-Level Concerns

Concerns or allegations that may meet the harm threshold

An allegation may meet the harm threshold where an adult has behaved in a way that has harmed a child, may have harmed a child, possibly committed a criminal offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved in a way that indicates they may not be suitable to work with children.

Concerns must be reported to the Manager/DSL immediately. If the concern is about the Manager/DSL, it must be reported to the Chair of Trustees/Advisory Board safeguarding lead. The LADO will be contacted in line with local procedures. Police and children's social care will be contacted where required.

Low-level concerns

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the staff code of conduct, including conduct outside work that could raise safeguarding concerns. Low-level does not mean insignificant. All low-level concerns must be recorded, reviewed and managed so that patterns can be identified and addressed.

22. Whistleblowing

Staff have a duty to raise concerns about unsafe practice, poor safeguarding culture, failure to act on concerns or the conduct of adults working with children. Concerns should usually be raised with the Manager/DSL. If the concern relates to the Manager/DSL, it should be raised with the Chair of Trustees/Advisory Board safeguarding lead. External routes such as NSPCC whistleblowing advice may also be used.

23. Reporting and Recording Concerns

- Listen, reassure and take the child seriously.
- Do not promise confidentiality; explain that information must be shared with people who can help.
- Do not investigate, ask leading questions or confront alleged perpetrators.
- Write a factual record as soon as possible, including date, time, location, child's words, body map if relevant, witnesses and immediate action.
- Report immediately to the DSL or Deputy DSL.
- If a child is in immediate danger, call 999 and then inform the DSL.
- If the DSL and deputies are unavailable and delay would place a child at risk, staff must contact children's social care, police or emergency services directly.

24. Information Sharing, Confidentiality and Records

Effective safeguarding depends on timely information sharing. Staff must share information with the DSL where there is a concern. The DSL will decide what information to share with parents/carers, commissioning schools, social care, police, health, Prevent, LADO or other agencies. Consent should be considered but lack of consent must not prevent sharing where a child is at risk of harm or safeguarding duties require it.

- Safeguarding records will be accurate, secure, dated, signed and separate from general student files.
- Decisions, actions, referrals and rationales will be recorded, including decisions not to refer.
- Records will be transferred securely to a new school/college/provision when a child leaves.
- Where additional information would support risk assessment or allow a child to thrive, the DSL will consider sharing this with the receiving setting in advance.

25. Training and Induction

All staff will receive safeguarding induction before working with learners. Induction will include this policy, KCSIE Part One, staff code of conduct, reporting procedures, online safety, behaviour expectations, attendance procedures, whistleblowing, safer working practice and the identity of the DSL team.

- Annual safeguarding refresher training is mandatory for all staff.
- DSL and Deputy DSL training will be updated at least every two years, with knowledge refreshed at least annually.
- Prevent awareness training will be provided.
- Additional training will be provided where roles involve outreach, home visits, vocational activities, sport, transport, online learning, SEND, mental health, exploitation or safer recruitment.

26. Parents, Carers and Partnership Working

SB Mentoring will work in partnership with parents/carers wherever safe and appropriate. Parents/carers will be informed that referrals may be made to children's social care where there are concerns about abuse, neglect or risk of harm. The DSL may decide not to inform parents/carers before a referral where doing so could place a child or another person at increased risk, compromise a police investigation or lead to evidence being destroyed.

27. Governance, Monitoring and Review

The Advisory Board/safeguarding governance lead will monitor the effectiveness of safeguarding arrangements through policy review, safeguarding updates, training checks, safer recruitment oversight, audit of records, attendance monitoring, filtering and monitoring review, incident analysis and scrutiny of safeguarding culture.

- This policy will be reviewed at least annually and whenever statutory guidance changes.
- The DSL will ensure staff have access to and understand the policy and procedures.
- The policy will be available to staff, families, commissioning schools and relevant partners.
- Safeguarding practice will be reviewed after serious incidents, allegations, significant concerns or changes in provision.

Appendix 1: Immediate Concern Flowchart

1. Concern, disclosure or incident identified
2. Is the child in immediate danger? If yes, call 999 immediately
3. Report to DSL or Deputy DSL the same day and without delay
4. Record facts clearly, using child's own words and noting date/time/action
5. DSL considers Early Help/Family Help, social care, police, LADO, Prevent, health or internal support
6. Record decision, rationale and review date; continue support and monitoring

Appendix 2: Local Contacts to Complete

Service	Contact details	When to use
Wiltshire MASH / Children's Social Care	In working hours: 0300 456 0108 Out of hours : 0300 456 0100	Safeguarding referral, consultation or child protection concern
Emergency Services	999	Immediate risk of harm or crime in progress
Police non-emergency	101	Crime or safeguarding concern not requiring 999
LADO	LADO@wiltshire.gov.uk	Allegations against staff, volunteers, contractors or adults working with children
Prevent / Channel	0800 789 321 / https://act.campaign.gov.uk/	Radicalisation or extremism concerns
Out of Hours Social Care	0300 456 0100	Urgent safeguarding concern outside office hours
NSPCC Whistleblowing Advice Line	08000280285 / help@NSPCC.org.uk	External advice for staff safeguarding concerns

Appendix 3: Staff Safeguarding Checklist

- ☐ I have read KCSIE Part One in full.
- ☐ I know who the DSL and Deputy DSLs are.
- ☐ I know how to report a concern and what to do if a child is in immediate danger.

- ☐ I understand child-on-child abuse, harmful sexual behaviour and online risks including AI-generated images.
- ☐ I know that all concerns, including low-level concerns about adults, must be reported.
- ☐ I understand professional boundaries and safer working practice.
- ☐ I know attendance, behaviour and mental health can be safeguarding indicators.
- ☐ I understand that safeguarding records must be factual, dated and shared promptly with the DSL.

References

- Department for Education, Keeping Children Safe in Education 2026, statutory guidance for schools and colleges, in force from 1 September 2026.
- Department for Education, Working Together to Safeguard Children.
- Previous SB Mentoring Safeguarding and Child Protection Policy 2025-26 supplied for amendment.