



Safeguarding and Child Protection Policy (including safer recruitment)

Approved by:	Paula Tucker	Date:	September 2026
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1. Purpose and principles

ReFocus is committed to safeguarding and promoting the welfare of all children. Safeguarding and child protection are central to the culture, decisions and day-to-day practice of the school and are the responsibility of everyone who works with or on behalf of ReFocus.

This policy sets out the arrangements through which ReFocus fulfils its safeguarding and child protection responsibilities. It applies to all staff, the proprietor, governors, volunteers, contractors, agency staff, trainee teachers and other adults working in or on behalf of the school, including during off-site and school-arranged activities.

ReFocus will take a child-centred approach. The welfare and best interests of the child will remain at the centre of decisions, while recognising that effective safeguarding depends on professional curiosity, timely information sharing, clear recording and appropriate multi-agency working.

The school aims to ensure that:

- children are protected from harm and receive help and support as soon as concerns emerge;
- all adults understand their safeguarding responsibilities and know how to report concerns;
- concerns, disclosures and allegations are responded to promptly and appropriately;
- children are listened to, taken seriously and supported to identify trusted adults;
- additional vulnerabilities and contextual risks are recognised and considered;
- online and offline safeguarding are treated as part of the same whole-school safeguarding culture;
- safer recruitment and ongoing suitability arrangements reduce the risk of unsuitable adults working with children.

2. Statutory framework

This policy has been prepared with regard to current legislation and statutory guidance, including:

- Keeping Children Safe in Education (KCSIE) 2026;
- Working Together to Safeguard Children 2026;
- Part 3 of the Schedule to the Education (Independent School Standards) Regulations 2014;
- The Children Acts 1989 and 2004;
- The Education Act 2002, where applicable;
- The Equality Act 2010 and relevant duties relating to non-discrimination and reasonable adjustments;
- The Human Rights Act 1998;
- The Counter-Terrorism and Security Act 2015 and the Prevent duty guidance;
- The Female Genital Mutilation Act 2003 and Serious Crime Act 2015;
- The Domestic Abuse Act 2021;
- The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- The School Attendance (Pupil Registration) (England) Regulations 2024 and current statutory attendance guidance;
- statutory guidance on mobile phones in schools, where relevant.

ReFocus will also work within the arrangements and procedures agreed by the relevant local safeguarding partners. Where legislation, statutory guidance or local safeguarding arrangements change, the school will update its procedures and this policy as required.

3. Definitions

3.1 Safeguarding and promoting the welfare of children

For the purposes of this policy, safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with safe and effective care; and
- taking action to enable all children to have the best outcomes.

3.2 Child protection

Child protection is part of safeguarding and refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.3 Abuse, neglect and exploitation

Abuse is a form of maltreatment of a child. It may involve inflicting harm or failing to act to prevent harm. The four main categories are physical abuse, emotional abuse, sexual abuse and neglect. Safeguarding concerns may overlap and children may experience more than one form of harm at the same time, including exploitation, domestic abuse, harmful behaviour in intimate relationships and online harm.

3.4 Children

In this policy, a child means anyone under the age of 18.

3.5 Nudes and semi-nudes

The making or sharing of nudes and semi-nudes includes photographs, videos and livestreams involving children under 18. Images may be self-generated, taken or created by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or “deep nudes”. Every incident requires a safeguarding response.

4. Roles and responsibilities

4.1 Everyone

Safeguarding is everyone's responsibility. All adults working with ReFocus must maintain professional curiosity, act on concerns, share information where necessary to protect children and never assume that someone else will take action.

4.2 Key safeguarding contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Laura Bolton	Laura@ReFocus.school
Deputy DSL	Hayley Perry	Hayley@ReFocus.school
Deputy DSL	Liam Kerr	Liam@ReFocus.school
Deputy DSL	Katie Close	Katie@ReFocus.school
Executive Headteacher	Paula Tucker	Paula@ReFocus.school
Chair of Governors	James Alcock	governor@ReFocus.school
Nominated Safeguarding Governor	Richard Boddy	Richard@ReFocus.school

Role	Name	Contact
Local Authority Designated Officer (LADO)	Northamptonshire	01604 362633

Contact details should be checked locally and updated where necessary without waiting for the annual review of the policy.

4.3 All staff

All staff will:

- read Part One of KCSIE 2026 in full and be supported to understand and apply it;
- understand the school safeguarding systems explained at induction, including this policy, the staff code of conduct, behaviour expectations, the safeguarding response to absence from education, online safety and the identity and role of the DSL and deputies;
- complete safeguarding and child protection training at induction and receive updates at least annually and whenever required;
- know how to respond to a disclosure and how to report and record a concern;
- know that they may make a referral to children's social care directly where necessary and must inform the DSL as soon as possible if they do so;
- be alert to children who may benefit from universal support, community-based early help, Family Help or statutory intervention;
- understand that children may not recognise or disclose harm and that barriers to disclosure must not reduce professional curiosity;
- maintain appropriate professional boundaries and report concerns about adults working with children.

4.4 The Designated Safeguarding Lead and deputies

The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the school's filtering and monitoring arrangements. The DSL will have appropriate status, authority, time, training, funding and resources to carry out the role.

The DSL will, directly or through appropriately trained deputies:

- provide advice and support to staff and coordinate the response to safeguarding concerns;
- manage referrals to children's social care, police, Channel, the Disclosure and Barring Service and other bodies as appropriate;
- work with local safeguarding partners, commissioners, placing schools, social workers and other professionals;
- maintain clear and reliable cover arrangements so concerns can be received and acted upon without delay whenever the DSL is unavailable;
- ensure safeguarding records are accurate, secure and appropriately transferred;
- promote a culture in which children are listened to and their wishes and feelings are considered;
- keep the Executive Headteacher informed of safeguarding issues as appropriate;
- maintain oversight of online safety, filtering and monitoring and relevant digital safeguarding risks.

4.5 The proprietor and governance arrangements

The proprietor holds ultimate responsibility for ensuring that ReFocus meets its statutory safeguarding obligations as an independent school. Governance arrangements will provide appropriate oversight and challenge, including through the nominated safeguarding governor where this role is delegated.

- ensure safeguarding and child protection are at the forefront of policy and practice;
- ensure this policy is reviewed at least annually and is available publicly;

- ensure staff and governors receive appropriate safeguarding training;
- ensure safer recruitment arrangements and the Single Central Record comply with statutory requirements;
- ensure appropriate filtering and monitoring systems are in place and their effectiveness is reviewed at least once every academic year;
- ensure procedures are in place for allegations and low-level concerns about adults;
- seek appropriate safeguarding assurance where other organisations use school premises or provide services to ReFocus pupils.

4.6 The Executive Headteacher

The Executive Headteacher is responsible for the day-to-day implementation of this policy, for ensuring adequate safeguarding arrangements and DSL cover, and for acting as case manager for allegations about staff where appropriate. Allegations about the Executive Headteacher will be managed by the Chair of Governors/proprietor in accordance with KCSIE and local LADO procedures.

5. Responding to concerns, disclosures and referrals

5.1 Immediate danger or risk of significant harm

If a child is in immediate danger, has been harmed, or there is reason to believe they are suffering or are likely to suffer significant harm, staff must act immediately. A referral should be made to local authority children's social care and/or the police as appropriate. If a staff member makes a referral directly, they must inform the DSL as soon as possible.

5.2 When a child makes a disclosure

Staff should:

- listen carefully and take the child seriously;
- allow the child to speak freely and avoid leading or investigative questions;
- remain calm and avoid expressions of shock, disbelief or judgement;
- reassure the child that they have done the right thing by speaking;
- explain that information will need to be shared with people who can help and never promise secrecy;
- record the concern as soon as possible, using the child's own words where appropriate and clearly separating fact from professional opinion;
- report the concern promptly through the school's secure safeguarding recording system and alert the DSL or a deputy.

Staff must not allow uncertainty about whether a child is ready to talk, whether they recognise their experience as harmful, or barriers linked to disability, language, shame, fear or vulnerability to prevent them from raising a concern with the DSL.

5.3 Concerns which do not require immediate referral

Where a concern does not indicate immediate danger or significant harm, staff should record it promptly and discuss it with the DSL. The DSL will consider the child's needs, known risks, existing plans and local thresholds, and decide whether the response should include support within school, community-based early help, Family Help, referral to children's social care or another service.

5.4 Escalation

ReFocus will not assume that a referral or involvement by another agency removes the school's safeguarding responsibility. Where the child's situation is not improving, information is not received, agreed actions are not completed, or the school remains concerned, the DSL will follow local escalation arrangements and continue to keep the child's circumstances under review.

5.5 Parents and carers

Parents/carers will normally be informed about safeguarding concerns and the action the school proposes to take. However, the DSL may seek advice and/or make a referral before contacting parents where doing so could place the child or another person at increased risk, impede a police or social care investigation, or otherwise be contrary to the child's best interests.

6. Family Help and multi-agency working

ReFocus recognises that effective safeguarding includes providing help before concerns reach the threshold for child protection intervention. Staff should be alert to children who may benefit from universal services, community-based early help or the targeted early help level of Family Help.

The school will work within local thresholds and multi-agency safeguarding arrangements. Where appropriate, ReFocus will contribute to Family Help assessments and plans, Child in Need work, Child Protection processes and other multi-agency arrangements. Staff may be asked to contribute information, attend meetings, complete agreed actions and support the child within school.

Where a child is placed at ReFocus by another school, local authority or commissioner, safeguarding responsibility is shared in practice through timely communication. ReFocus will make clear what information is required at referral and admission, who retains statutory or commissioning responsibilities, and how safeguarding concerns, attendance, significant incidents and changes in risk will be communicated.

7. Information sharing, confidentiality and record keeping

7.1 Information sharing

Timely and proportionate information sharing is essential to safeguarding. Data protection law does not prevent the sharing of information for the purpose of keeping children safe. Staff should share information on a need-to-know basis and seek advice from the DSL where uncertain; concerns about data protection must not be allowed to stand in the way of protecting a child.

ReFocus will consider the purpose of sharing, the child's safety and welfare, what information is relevant and necessary, who needs it, and whether sharing could create additional risk. Decisions and the reasons for them will be recorded.

7.2 Confidentiality

Safeguarding information is confidential but not secret. Staff must never promise a child absolute confidentiality. Information should be shared only with those who need it for safeguarding, welfare, support or legal purposes.

7.3 Recording

All safeguarding concerns, discussions, decisions, actions and the rationale for decisions will be recorded on the school's secure safeguarding recording system. Records should be clear, factual, timely and sufficiently detailed to show what was known, what was considered, what action was taken and why.

7.4 Transfer of safeguarding records

When a child moves to another education setting, the DSL will ensure the child protection file is transferred securely, separately from the main pupil file and within the timescale required by KCSIE. Where risks are significant or complex, the DSL will make direct contact with the receiving DSL in advance where appropriate.

Information transferred should be sufficiently clear and structured for the receiving setting to distinguish current concerns, relevant context and ongoing support needs from historic information. ReFocus will likewise

ensure incoming safeguarding information is reviewed promptly by an appropriately trained member of staff and clarification sought where information is incomplete or unclear.

8. Children who may be at greater risk of harm

Any child can experience abuse or neglect. Some children may face additional barriers to recognition, disclosure or access to support, or may experience multiple and overlapping risks. ReFocus will avoid assumptions and consider each child's individual circumstances.

8.1 Alternative provision and multiple vulnerabilities

ReFocus recognises that many pupils referred to alternative provision may have additional vulnerabilities or experience multiple overlapping risks. Safeguarding information will therefore be considered carefully at referral, admission, review, transfer between sites and when placements end. Changes in attendance, behaviour, relationships, presentation or engagement will be considered in context rather than viewed in isolation.

8.2 Special educational needs, disabilities and health conditions

Children with SEND or certain health conditions can face additional safeguarding challenges. Barriers may include communication difficulties, isolation, greater dependence on adults, intimate or personal care, assumptions that changes in behaviour or mood relate only to disability, difficulty understanding whether behaviour towards them is abusive, and difficulty distinguishing fact from fiction online.

Reasonable adjustments and additional pastoral, communication or specialist support will be used where appropriate. ReFocus will work with parents/carers, commissioners and professionals to understand individual needs and risks.

8.3 Medical conditions and allergies

A medical incident is not automatically a safeguarding concern. However, repeated failure to provide medication, follow medical advice, share necessary information or otherwise meet a child's health needs may indicate neglect or increase safeguarding risk. Staff will follow the Supporting Pupils with Medical Conditions and Allergy Safety policies and raise safeguarding concerns with the DSL where appropriate.

8.4 Mental health

Mental health difficulties can in some cases be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff should be alert to concerns including self-harm, eating disorders, suicidal thoughts, significant changes in mood or behaviour and other indicators of emotional distress. Where a mental health concern is also a safeguarding concern, safeguarding procedures must be followed immediately. Other concerns will be addressed through the school's pastoral and support arrangements and specialist referral where appropriate.

8.5 Young carers

Caring responsibilities may affect a child's attendance, learning, behaviour, relationships and wellbeing. ReFocus will be alert to young carers, seek to identify needs early and support access to appropriate help.

8.6 Children with a social worker

Where ReFocus is aware that a child has a social worker, this will inform decisions about safeguarding, attendance, behaviour, pastoral and academic support. The DSL will work with the social worker and ensure relevant information is shared appropriately.

8.7 Looked-after and previously looked-after children

Appropriate staff will have the information required to safeguard looked-after and previously looked-after children, including relevant legal status, care arrangements, social worker and Virtual School Head details. The designated teacher and DSL will work together to promote safety, welfare and educational achievement.

8.8 Children who are lesbian, gay or bisexual, and children who are gender-questioning

ReFocus recognises that children who are, or are perceived to be, lesbian, gay, bisexual or gender-questioning may be targeted by others and may face barriers to seeking help. Bullying, harassment and discriminatory behaviour will be challenged and children will be supported to identify trusted adults.

Where a child is questioning their gender, ReFocus will act sensitively and in accordance with KCSIE. The school will not initiate social transition. Where a child or parent/carers requests support, decisions will be safeguarding-led, child-centred, appropriately recorded and will involve parents/carers in accordance with statutory guidance. The school will consider the welfare, privacy, safety and rights of all children affected and will comply with statutory requirements relating to single-sex facilities, sport and accommodation where relevant.

8.9 Absence from education and elective home education

Repeated or prolonged absence from education can be a warning sign of safeguarding risk, including exploitation, abuse, neglect, mental health difficulties or unmet SEND. ReFocus will follow its Attendance Policy and statutory attendance/CME requirements, make reasonable enquiries where required and share information with commissioners and local authorities as appropriate.

Where a parent/carers indicates an intention to remove a child from school for elective home education, safeguarding concerns, SEND, social care involvement and other vulnerabilities will be considered and relevant information shared with the local authority in accordance with statutory guidance.

9. Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence

ReFocus recognises that children can abuse other children and that this can happen inside or outside school and online. All child-on-child abuse is unacceptable, will be taken seriously and will not be dismissed as banter, part of growing up or normal relationship behaviour.

Child-on-child abuse can include bullying and discriminatory bullying; physical violence; threats involving weapons; abuse in intimate relationships; sexual harassment; sexual violence; harmful sexual behaviour; upskirting; coercion; initiation or hazing; the making or sharing of nudes and semi-nudes, including AI-generated sexual imagery; and other abusive, violent or exploitative behaviour.

ReFocus recognises that some forms of child-on-child abuse are gendered. Girls are more likely to experience some forms of sexual abuse and harassment and boys are more likely to be perpetrators in some contexts; however, abuse can affect any child and assumptions about gender must never prevent recognition or support.

9.1 Prevention

The school will seek to prevent child-on-child abuse through a whole-school culture that challenges sexism, racism, misogyny, misandry, homophobia, biphobia, sexual harassment, discriminatory and derogatory behaviour, violence and other harmful conduct. Preventative education, relationships and health education, pastoral work and staff modelling will reinforce respectful relationships, consent, boundaries, safety and reporting.

9.2 Responding to reports

Reports will be taken seriously and managed in a way that supports the child who has experienced harm, the child alleged to have caused harm and any other children affected. Staff will report concerns immediately to the DSL and avoid undertaking their own investigation.

The DSL will consider immediate safety, wishes and feelings, age and developmental stage, power imbalance, vulnerability, the nature and frequency of behaviour, whether there is a pattern, online or contextual factors, risk to others and whether behaviour may indicate that the alleged perpetrator is themselves in need of safeguarding or support.

Depending on the circumstances, the response may include internal safeguarding and pastoral action, risk assessment, universal or community-based support, referral to Family Help, children's social care and/or police. Detailed responses to harmful sexual behaviour, sexual harassment and sexual violence will follow Part Five of KCSIE 2026 and local safeguarding procedures.

9.3 Nudes and semi-nudes

Any incident involving the making or sharing of nudes or semi-nudes, whether consensual or non-consensual and including digitally altered or AI-generated imagery, must be reported to the DSL immediately and treated as a safeguarding matter.

Unless directed by the DSL in accordance with current guidance, staff must not view, copy, print, share, store, save or ask a child to download sexual imagery. If imagery is viewed accidentally, this must be reported immediately. Staff must not shame or blame children involved.

10. Online safety, Generative AI and digital safeguarding

Technology is a significant component of many safeguarding and wellbeing issues. ReFocus treats online safety as an integral part of safeguarding rather than as a separate concern.

The school considers online risk through the four broad areas of content, contact, conduct and commerce. Risks include harmful or illegal content; grooming and exploitation; harmful interaction with other users or applications, including Generative AI systems; cyberbullying; sexual harassment; the creation or sharing of explicit or AI-generated imagery; misinformation; radicalisation; scams, gambling and other financial harms.

ReFocus will:

- educate pupils about safe, responsible and age-appropriate use of technology and Generative AI;
- maintain appropriate filtering and monitoring arrangements on school systems and networks;
- ensure staff understand their roles and responsibilities for filtering and monitoring;
- review the effectiveness of filtering and monitoring at least once every academic year, led by the responsible member of SLT with support from the DSL and IT support, including checks on internet-connected devices in relevant locations and a record of the review;
- respond to online concerns using the same safeguarding principles that apply offline;
- work with parents/carers and other agencies where online activity creates a risk to a child.

Further detail is set out in the Online Safety Policy and staff/student Acceptable Use arrangements.

11. Mobile phones and smart technology

ReFocus recognises the safeguarding, welfare and educational risks associated with pupils' unrestricted access to mobile phones and smart technology. In accordance with statutory guidance, ReFocus operates as a mobile phone-free environment by default during the school day.

Detailed arrangements, including expectations, storage or access arrangements, reasonable exceptions, searching/confiscation and consequences, are set out in the school's Mobile Phones and Smart Technology Policy. This safeguarding policy should be read alongside that policy and the Online Safety Policy.

12. Specific safeguarding issues

Staff should be alert to the full range of safeguarding issues described in KCSIE and local safeguarding procedures. ReFocus will provide training and updates according to the needs of pupils and emerging local or national risk. The following areas require particular awareness.

12.1 Child criminal exploitation, child sexual exploitation, county lines and modern slavery

Exploitation can be committed by individuals, groups or organised networks and may involve coercion, grooming, threats, violence, debt, exchange or perceived belonging. Children may not recognise themselves as victims and may be criminalised for actions undertaken under coercion. Concerns about exploitation must be reported to the DSL and referred to appropriate agencies according to risk.

12.2 Domestic abuse and Operation Encompass

Domestic abuse can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse. Children may be victims in their own right through seeing, hearing or experiencing the effects of domestic abuse. ReFocus will respond to information received through Operation Encompass or other police/social care notifications and ensure appropriate support and safeguarding action.

12.3 Female genital mutilation (FGM)

FGM is illegal and a form of child abuse. Teachers have a personal statutory duty to report to the police where, in the course of their professional work, they discover that FGM appears to have been carried out on a girl under 18. The teacher should also inform the DSL unless there is a good reason not to do so. Concerns that a child may be at risk of FGM must be reported to the DSL. Staff must never examine a child to determine whether FGM has taken place.

12.4 Forced marriage and honour-based abuse

Forced marriage and abuse committed in the name of so-called honour are safeguarding concerns. Staff must report concerns to the DSL and must not approach family members or attempt mediation where doing so could increase risk. The DSL will seek specialist and statutory advice as appropriate.

12.5 Preventing radicalisation

ReFocus will fulfil its Prevent duty and build pupils' resilience to radicalisation and extremist influence. Staff will receive appropriate Prevent awareness training and report concerns to the DSL. The DSL will assess risk and refer to police, Channel or children's social care as appropriate. In an emergency, staff must contact the emergency services.

12.6 Serious violence

Staff should be alert to indicators of serious violence, weapon carrying, exploitation, gang or group association, unexplained gifts or money, significant absence, changes in relationships and other signs of increased risk. Concerns should be reported to the DSL and managed through safeguarding and risk assessment procedures.

13. Concerns or allegations about adults and low-level concerns

Any concern about the conduct of a member of staff, supply worker, trainee teacher, volunteer, contractor or other adult working with children must be reported promptly. The welfare of the child is paramount.

13.1 Concerns or allegations that may meet the harm threshold

Where it is alleged that an adult working with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates they may pose a risk of harm; or
 - behaved, or may have behaved, in a way that indicates they may not be suitable to work with children,
- the concern must be reported to the Executive Headteacher without delay and managed in accordance with KCSIE Part Four and local LADO procedures. Concerns about the Executive Headteacher must be reported to the Chair of Governors/proprietor and the LADO. This includes behaviour outside school where it may indicate transferable risk.

13.2 Low-level concerns

A low-level concern is any concern, no matter how small and even where no more than causing a sense of unease, that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the harm threshold. Low-level concerns will be reported, recorded and considered so that patterns or emerging concerns can be identified. ReFocus will follow its staff code of conduct and low-level concerns procedures.

13.3 Whistleblowing

Staff who feel unable to raise a safeguarding concern internally, or believe that a concern has not been addressed appropriately, should use the school's Whistleblowing Policy and may use external whistleblowing routes where appropriate.

14. Training

14.1 All staff

All staff will receive safeguarding and child protection training, including online safety, at induction. Training will be regularly updated and staff will receive safeguarding updates at least annually and more frequently where required. Staff will be supported to understand the school's systems, local safeguarding arrangements, Family Help, child-on-child abuse, online safety, filtering and monitoring, allegations about adults and the specific risks relevant to the ReFocus cohort.

14.2 DSL and deputy DSLs

The DSL and deputies will complete role-specific safeguarding training at least every two years, Prevent awareness training, and refresh their knowledge and skills at regular intervals and at least annually. They will maintain an up-to-date understanding of local thresholds, referral processes, multi-agency working, online safety and emerging safeguarding risks.

14.3 Proprietor and governors

The proprietor and governors will receive safeguarding and child protection training at induction and updates sufficient to enable effective oversight, assurance and challenge. The Chair of Governors and any person likely to act as case manager for allegations will receive appropriate training for that role.

14.4 Safer recruitment

At least one person involved in each recruitment process will have completed appropriate safer recruitment training. Recruitment practice will follow KCSIE 2026 and the arrangements in Appendix A.

15. Monitoring and review

This policy will be reviewed at least annually and sooner where required by changes to legislation, statutory guidance, local safeguarding arrangements, school structure or learning from safeguarding practice or incidents.

The DSL will monitor implementation and bring significant safeguarding issues, themes and assurance information to the Executive Headteacher and governance arrangements as appropriate. Review will focus on whether procedures are understood and effective rather than creating additional standalone evidence systems where existing safeguarding records and school processes provide the necessary assurance.

16. Links with other policies and procedures

This policy should be read alongside relevant ReFocus policies and procedures, including:

- Behaviour Policy;
- Attendance Policy;
- Online Safety Policy;
- Staff and Student Acceptable Use arrangements;
- Mobile Phones and Smart Technology Policy;
- Staff Code of Conduct;
- Low-Level Concerns / Allegations procedures;
- Whistleblowing Policy;
- SEND Policy;
- Supporting Pupils with Medical Conditions Policy;
- Allergy Safety Policy;
- Health and Safety Policy;
- Risk Assessment arrangements;
- Equality and Diversity Policy;
- Relationships, Sex and Health Education arrangements;
- Data Protection and Records Retention arrangements;
- Complaints Procedure;
- Admissions / Referral and Placement arrangements.

Appendix A: Safer Recruitment

ReFocus is committed to safer recruitment and to preventing unsuitable people from working with children. Recruitment and ongoing suitability arrangements will follow KCSIE 2026, the Education (Independent School Standards) Regulations 2014 and relevant legislation.

A1. Recruitment and selection

Recruitment processes will be designed to identify and assess suitability to work with children. ReFocus will:

- include the school's commitment to safeguarding in recruitment information;
- require applicants to provide a full employment history and account for gaps or anomalies;
- scrutinise applications and references and resolve concerns before appointment;
- seek references for shortlisted candidates, including internal candidates, and verify them with the referee where appropriate;
- carry out an online search on shortlisted candidates as part of due diligence to identify publicly available information that may be relevant to suitability;
- ensure at least one person involved in the recruitment process has completed safer recruitment training.

A2. Pre-appointment checks

Before appointment, ReFocus will complete and record the checks required for the role. These may include:

- identity verification;
- right to work in the UK;
- an enhanced DBS check and children's barred list information where the role is regulated activity;
- a separate barred list check where permitted and required pending an enhanced DBS certificate;
- prohibition from teaching checks for teaching roles;
- section 128 direction checks for management, proprietor or governance roles where required;
- professional qualifications where required;
- appropriate checks for individuals who have lived or worked outside the UK;
- confirmation of medical fitness to carry out the role, after an offer and in accordance with equality law;
- any other checks required by KCSIE or the Independent School Standards.

ReFocus will use the DfE "Check a teacher's record" service and other official services as required. Original or acceptable evidence will be checked and identity verified before the individual begins work unless a lawful and appropriately risk-assessed exception applies.

A3. Regulated activity and volunteers

ReFocus will determine whether work or volunteering amounts to regulated activity in accordance with current legislation and KCSIE. The previous supervision exemption from regulated activity has been removed; supervision must therefore not be relied upon as a reason to omit checks where the activity is regulated activity.

Volunteers will be subject to appropriate checks according to the activity undertaken. Where a volunteer is in regulated activity, the required enhanced DBS check and barred list information will be obtained. ReFocus will not knowingly allow a barred person to engage in regulated activity.

A4. Agency and third-party staff

Before an agency or third-party worker begins work, ReFocus will obtain written confirmation that the required recruitment and safeguarding checks have been completed and will verify the identity of the person presenting for work. The school will retain responsibility for responding to any safeguarding concern arising while the individual is working at ReFocus and will liaise with the employing organisation as required.

A5. Contractors and self-employed people

Contractors and self-employed individuals will be subject to the level of safeguarding checks required by KCSIE according to their role and whether they are in regulated activity. Individuals who have not undergone the required checks will not be permitted to engage in regulated activity and will be subject to appropriate supervision/access controls where relevant. Identity will be checked on arrival.

A6. Trainee teachers

For salaried trainee teachers employed by ReFocus, the school will complete the required checks. For fee-funded trainees, ReFocus will obtain written confirmation from the training provider that required checks have been completed and that the trainee has been judged suitable to work with children.

A7. Proprietors and governors

The proprietor, governors and others involved in management will undergo the checks required by the Independent School Standards and KCSIE, including DBS, identity, right to work, section 128 and overseas checks where applicable to the role.

A8. Single Central Record

ReFocus will maintain a Single Central Record (SCR) containing the information required by the Independent School Standards and KCSIE. The SCR will be kept accurate and up to date and will be subject to regular internal checking.

A9. Existing staff, volunteers and ongoing suitability

Safeguarding is not limited to recruitment. Where information raises concerns about the suitability of an existing member of staff or volunteer, ReFocus will consider whether further checks, risk assessment, disciplinary action, referral to the LADO or other action is required. Where an individual moves into a role requiring different checks, the additional checks will be completed before they undertake that activity where required.

A10. Statutory referrals

ReFocus will make referrals to the Disclosure and Barring Service, the Secretary of State / Teaching Regulation Agency and other bodies where the legal criteria are met. A referral will not be avoided because an individual resigns or otherwise ceases to work for the school.

A11. Record retention

Copies and records of recruitment checks will be retained only for as long as permitted or required by law and school retention arrangements. The SCR will record the date on which required checks were completed and relevant information required by the Independent School Standards.

Appendix B: Contextual and local safeguarding

ReFocus recognises that safeguarding risks change over time and according to the communities, locations and individual pupils served by the school. The DSL will maintain an understanding of current and emerging risk through pupil information, local safeguarding arrangements, commissioners, multi-agency working, professional networks and national guidance.

Contextual information will inform staff training, curriculum provision, pastoral support, risk assessment and safeguarding practice. Areas considered may include:

- child criminal and sexual exploitation, county lines and modern slavery;
- serious violence, weapons, gangs and group-based harm;
- domestic abuse, coercive control and harmful behaviour in intimate relationships;
- sexual harassment, harmful sexual behaviour and violence against women and girls;
- online harms, Generative AI, image-based abuse and financial/scam risks;
- mental health, self-harm, suicide risk and eating disorders;
- substance misuse;
- FGM, forced marriage and honour-based abuse;
- radicalisation and extremism;
- absence from education, missing episodes and risks associated with placement or accommodation.

This appendix intentionally identifies broad risk areas rather than named programmes or annual activity. The school will adapt its response as local and individual needs change.

Appendix C: Safeguarding reporting and escalation guide

This guide supports day-to-day practice. It does not replace professional judgement, KCSIE or local safeguarding procedures.

Stage	What to do
1. Concern or disclosure	Listen, take seriously, consider immediate safety. Do not investigate or promise confidentiality.
2. Immediate risk	If a child is in immediate danger or at risk of significant harm, contact children's social care and/or police without delay. Inform the DSL as soon as possible.
3. Report and record	Record promptly on the school's secure safeguarding system using clear factual language and alert the DSL/deputy.
4. DSL assessment	Consider known history, child's wishes, vulnerability, context, local thresholds, risk to others and whether immediate protective action is needed.
5. Appropriate response	Use internal support, universal/community-based support, Family Help, children's social care, police, Channel or another specialist service as appropriate.
6. Parents/carers	Inform normally, unless doing so may increase risk, compromise an investigation or otherwise be contrary to the child's best interests.
7. Record decision	Record actions, discussions, referrals and the rationale for decisions, including decisions not to refer.
8. Review and escalate	Continue to review. If risk persists or the response from another agency is insufficient, use local escalation arrangements. Do not assume someone else is acting.

If the concern relates to an adult working with children, follow section 13 and report to the Executive Headteacher (or Chair of Governors/proprietor if the concern is about the Executive Headteacher) without delay.