



Safeguarding and Protection Policy

Author: <i>Primary person responsible for implementation and monitoring of this policy</i>	Caroline Dean. <i>Head of College.</i>
Adopted:	December 2025
Approved By:	Diane Ainsworth <i>Digital Advantage Trustee</i> Bethany Kenney <i>Interim DISC Safeguarding Governor</i> Sam Hirst <i>DISC Chair of Governors</i>
Next Review Date: <i>Reviewed and updated at least annually and as required</i>	September 2026

1. Introduction

DISC is committed to safeguarding and promoting the welfare, protection and wellbeing of all interns enrolled at DISC, including children, young people and vulnerable adults. Safeguarding is fundamental to DISC's culture and practice and is embedded across all areas of provision.

We ensure that:

1. Interns are protected from maltreatment
2. Interns grow up in safe and effective environments
3. Interns receive safe and effective care
4. All interns have the best life chances and are supported to flourish
5. Staff are equipped with the training and knowledge to recognise and respond to concerns

Safeguarding and Protection Policy

This policy sets out DISC's safeguarding approach in line with statutory guidance, including **Keeping Children Safe in Education (KCSIE) 2025**, and is reviewed annually or sooner if legislation changes.

An **intern-centred approach** is maintained at all times.

2. Statutory and Regulatory Framework

This policy is informed by the following legislation and guidance:

1. Keeping Children Safe in Education (DfE, September 2025)
2. Working Together to Safeguard Children (2024)
3. Children Act 1989 and 2004
4. Safeguarding Vulnerable Groups Act 2006
5. Care Act 2014
6. Working Together to Improve School Attendance (Statutory, September 2025)
7. Multi-agency Statutory Guidance on FGM (2016, updated 2020)
8. Child Sexual Exploitation Definition and Guidance (DfE)
9. Relationships, Sex and Health Education (DfE)
10. Data Protection Act 2018 and UK GDPR
11. Prevent Duty Guidance (2023)
12. Counter-Terrorism and Security Act 2015

DISC also follows local safeguarding partnership arrangements and contributes to multi-agency safeguarding processes.

3. Roles and Responsibilities

Safeguarding is everyone's responsibility. All staff, volunteers and Governors/Trustees must know how to recognise, report and respond to concerns.

3.1 Designated Safeguarding Lead (DSL)

The **DSL, Caroline Dean (Head of College)**, holds lead responsibility for:

1. Managing safeguarding referrals
2. Ensuring policies and procedures are embedded

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3. Liaising with Children's Social Care and safeguarding partners
4. Oversight of attendance monitoring (statutory from Sept 2025)
5. Supporting interns who are looked-after or in kinship care
6. Working with the Virtual School Head
7. Managing digital safeguarding, filtering/monitoring and online safety
8. Ensuring staff training is up to date
9. Maintaining safeguarding records
10. Deputy DSLs support the DSL and act in their absence.

3.2 Governance Board including Governors and Trustees

The **Governance Board** provides strategic safeguarding oversight.

Safeguarding Lead Governors are Jenny Nute/Beth Kenney Interim.

Governors /Trustees are responsible for:

- Ensuring statutory compliance with KCSIE 2025
- Reviewing this policy annually
- Monitoring safeguarding culture and practice
- Ensuring safer recruitment procedures are implemented
- Challenging and supporting the DSL and leadership

Nominated Safeguarding Governor/Trustee

Responsibilities include:

- Acting as a link between the Governance Board and DSL
- Reviewing safeguarding records and systems
- Providing governance-level scrutiny

3.3 All Staff

All staff must:

- Report concerns immediately to the DSL/Deputy DSL
- Record concerns factually and promptly

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- Maintain professional curiosity and boundaries
- Complete mandatory safeguarding and online safety training
- Understand how to respond to disclosures

Deputy DSLs are: Jonathan Bacon, Lizzie Northcote-Smith, Trish Barber, Clare O’Toole, Kirsty Bradley-Law.

4. Types of Abuse and Exploitation

DISC follows the definitions set out in statutory guidance (KCSIE 2025; Working Together 2024). Abuse can occur online or in person and may be perpetrated by adults or children.

Categories of abuse include:

4.1 Physical Abuse

May involve hitting, shaking, poisoning, burning, forced restraint or causing physical harm.

4.2 Emotional Abuse

Persistent emotional maltreatment such as humiliation, intimidation, isolation, or deliberate harm to self-esteem.

4.3 Sexual Abuse

Forcing or enticing a child or vulnerable adult to take part in sexual activities, including online abuse, coercion, grooming, exploitation or indecent images.

4.4 Neglect

Persistent failure to meet basic emotional or physical needs, including failure to ensure supervision, nutrition, hygiene, medical care or safe environments.

4.5 Child-on-Child Abuse

Can include bullying, sexual harassment, sexual violence, coercion, exploitation, initiation/hazing, and online abuse.

DISC recognises that children may harm other children and responds proportionately to both the victim’s and perpetrator’s needs.

4.6 Contextual Safeguarding

Harm may occur outside the home or education setting — e.g., in peer groups, online spaces, neighbourhoods or community settings.

4.7 Child Criminal Exploitation (CCE)

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Including county lines, forced criminality, coercion, debt bondage and exploitation through technology.

4.8 Child Sexual Exploitation (CSE)

Where an individual or group takes advantage of an imbalance of power to coerce a child/vulnerable adult into sexual activity in exchange for something they need or want.

4.9 Online Abuse

Abuse facilitated through digital platforms or technology, including:

- Grooming
- Sextortion
- Exposure to harmful content
- Misinformation/disinformation
- AI-generated deepfakes
- Coercive control via digital means

DISC adopts a whole-college approach to digital safeguarding.

5. Specific Safeguarding Duties

The following areas require increased attention under statutory guidance.

5.1 Attendance Monitoring (Statutory from September 2025)

DISC is committed to improving and monitoring attendance in line with:

- **Working Together to Improve School Attendance (DfE, 2025)**
- KCSIE 2025 requirements on attendance as a safeguarding factor

DISC will:

- Record, monitor and analyse patterns of attendance
- Escalate concerns promptly to the DSL
- Engage with parents/carers to address barriers
- Refer to local authority partners when necessary

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- Recognise that persistent absence may indicate vulnerability or harm

The DSL oversees attendance as part of safeguarding duties.

5.2 Alternative Provision (AP)/External provision/services

Where interns attend AP/External provision/services, DISC will:

- Conduct robust safeguarding checks before placement
- Ensure the AP has appropriate policies, supervision and safety systems
- Require regular attendance and welfare updates
- Maintain oversight of educational progress
- Visit or check in regularly where appropriate

AP/External provision/services are only used where it is in the intern's best interests and where risk is effectively managed.

5.3 Looked-After Children (LAC) & Kinship Care

DISC recognises that interns in care or **kinship care arrangements** may have additional safeguarding vulnerabilities.

The DSL will:

- Work closely with the **Virtual School Head (VSH)**
- Monitor progress, attendance and welfare
- Ensure Personal Education Plans (PEPs) are updated
- Support carers and multi-agency partners
- Ensure staff are aware of the needs of LAC and care-experienced young people

5.4 Early Help

Early Help provides support at the earliest point of need and prevents concerns from escalating.

DISC will:

- Identify emerging needs
- Provide support internally

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- Work with external agencies and families
- Record all Early Help interventions

5.5 Prevent Duty

DISC complies with the Prevent Duty and will:

- Identify interns vulnerable to radicalisation
- Provide staff training
- Make referrals to CHANNEL when appropriate
- Promote online and offline critical thinking and resilience

Radicalisation is treated as a safeguarding concern

6. Online Safety

DISC adopts a **whole-college approach** to online safety, recognising the rapid evolution of digital risks.

6.1 The 4 Cs of Online Safety

Content

Exposure to illegal or harmful content including extremism, hate material, pornography, gambling, misinformation, disinformation and **AI-generated deceptive media**.

Contact

Online grooming, coercion, manipulation, extortion or enticement into risky behaviour.

Conduct

Cyberbullying, sexting, online harassment, harmful challenges, digital reputation risks.

Commerce

Fraud, microtransactions, scams, targeted exploitation.

6.2 Filtering and Monitoring

DISC will ensure that:

- Filtering and monitoring systems comply with DfE expectations
- Alerts are reviewed promptly

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- Age-appropriate filtering is applied
- Systems are regularly tested and risk-assessed

6.3 AI, Deepfakes and Emerging Technologies

Staff and interns must understand new digital threats. DISC will:

- Train staff on AI-generated content risks
- Build intern digital literacy (misinformation, disinformation, deepfake recognition)
- Follow DfE AI guidance for schools and colleges
- Incorporate cyber-security awareness into training

6.4 Education and Curriculum

DISC ensures interns learn:

- How to stay safe online
- How to identify manipulation, coercion and grooming
- Skills for recognising misinformation/disinformation
- Responsible use of social media and digital platforms

7. Safer Recruitment

DISC is committed to creating a safe environment by ensuring all staff, volunteers and Governors/Trustees are suitable to work with children and vulnerable adults.

Safer recruitment includes:

7.1 Advertising and Shortlisting

- Job adverts include safeguarding statements
- Applicants are informed that safeguarding suitability will be assessed
- Online searches are completed for shortlisted candidates (as required by KCSIE 2025)

7.2 Interviews

- At least one safer recruitment-trained panel member participates
- Safeguarding-specific questions are included

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- Employment history is scrutinised and gaps explored

7.3 Pre-Employment Checks

All successful candidates undergo:

- Enhanced DBS with barred list check (where appropriate)
- Verification of identity
- Verification of qualifications
- Right-to-work checks
- Two satisfactory references
- Overseas checks where required

7.4 Single Central Record (SCR)

DISC maintains an up-to-date SCR containing all required checks.

7.5 Induction

New staff receive:

- DISC safeguarding induction
- Code of conduct
- Policy overview (including online safety, Prevent, attendance duties)

8. Training

Safeguarding training ensures all staff understand their responsibilities.

8.1 All Staff Training

All staff receive:

- Induction safeguarding training
- Annual safeguarding updates
- Training in recognising abuse, including online risks and child-on-child abuse
- Digital safeguarding and cyber-security training

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- Training on filtering/monitoring procedures
- Updates on AI-generated digital harm (deepfakes, misinformation etc.)

8.2 DSL and Deputy DSL Training

DSLs receive training every two years and regular updates on:

- Local safeguarding procedures
- Multi-agency working
- Early Help
- Online safety, cyber risks and digital safeguarding
- Attendance safeguarding duties

8.3 Governor and Trustee Training

Governors/Trustees receive safeguarding governance training annually, including:

- KCSIE 2025 updates
- Oversight responsibilities
- Data protection in safeguarding
- Online safety governance

9. Reporting and Recording Concerns

DISC maintains a clear and robust reporting system. Safeguarding concerns must be responded to **immediately**.

9.1 Reporting Concerns

Staff must:

- Report concerns to the DSL or Deputy DSL without delay
- Never assume someone else will act
- Act on disclosures using child-centred practice

9.2 Responding to Disclosure

Staff will:

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- Listen calmly
- Reassure the intern that they are being taken seriously
- Not ask leading questions
- Explain confidentiality boundaries
- Record the information accurately
- Refer promptly to the DSL

9.3 Recording

Records must be:

- Factual, accurate and detailed
- Completed as soon as possible
- Stored securely
- Shared on a need-to-know basis
- Retained in line with statutory requirements

9.4 Escalation

If staff believe a concern has not been appropriately addressed, they must escalate to:

- The DSL
- Deputy Designated Safeguarding Lead (if DSL is unavailable)
- The Nominated Safeguarding Governor/Trustee
- External safeguarding partners if necessary

9.5 Immediate Risk

Where a child or vulnerable adult is at immediate risk of harm:

- Contact emergency services (999)
- Inform the DSL at the earliest opportunity

10. Curriculum and RSHE

DISC integrates safeguarding themes throughout its curriculum to ensure interns develop the knowledge and skills to stay safe, both online and offline.

10.1 Safeguarding Through Learning

Safeguarding education includes:

- Healthy and respectful relationships
- Consent and personal boundaries
- Mental health and wellbeing
- Digital literacy and critical thinking
- Recognising grooming and exploitation
- Identifying misinformation, disinformation and AI-generated deception
- Responsible use of technology and social media

10.2 RSHE (Relationships, Sex and Health Education)

DISC delivers RSHE in line with updated DfE guidance.

From **September 2026**, RSHE must reflect:

1. Updated statutory expectations
2. Strengthened sexual harassment and sexual violence content
3. Expanded online safety content, including AI risks
4. Clearer teaching on consent and harmful behaviours

RSHE provision is reviewed annually and informed by student feedback.

10.3 Supporting Vulnerable Groups

The curriculum is adapted to meet the needs of:

- Learners with SEND
- Care-experienced interns
- Interns in kinship care
- Interns at risk of exploitation

DISC ensures all learners can access safeguarding education appropriate to their developmental stage.

11. Information Sharing

Effective information sharing is crucial to safeguarding.

DISC follows:

- **Data Protection Act 2018**
- **UK GDPR**
- **KCSIE 2025**
- **Working Together 2024**
- **DfE’s “Data Protection: A Toolkit for Schools”**

11.1 Principles of Information Sharing

DISC ensures information is:

- Shared lawfully, proportionately and securely
- Provided on a need-to-know basis
- Recorded and stored appropriately
- Shared with safeguarding partners where necessary

Safeguarding concerns **always override** data protection concerns where risk of harm is present.

11.2 Multi-Agency Information Sharing

DISC works with:

- Local Authority Children’s Services
- Early Help teams
- Virtual School Heads
- Health services
- Police (including Prevent)
- Alternative Provision (AP) providers

The DSL coordinates multi-agency communication.

11.3 Transfer of Records

When a learner moves to another provision, safeguarding records are:

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- Transferred securely
- Sent directly to the receiving DSL
- Acknowledged with confirmation of receipt

DISC follows statutory retention schedules for safeguarding records.

12. Addendum – Policy Updates (September 2025)

The following updates reflect changes required under **KCSIE 2025** and revisions to national safeguarding guidance:

12.1 Attendance (Statutory Duty)

- Attendance monitoring now forms part of safeguarding practice.
- Persistent absence must be reviewed by the DSL.
- Escalations must follow the DfE's 2025 Attendance Framework.

12.2 Alternative Provision

- Strengthened safeguarding checks and monitoring requirements.
- AP providers must supply regular attendance and welfare updates.

12.3 Online Safety Enhancements

- Expanded online risks, including AI-generated content, misinformation and deepfakes.
- Increased emphasis on cyber security and digital literacy.
- Updated expectations for filtering and monitoring systems.

12.4 Virtual School Head & Kinship Care

- DSL responsibilities now include oversight of interns in kinship care arrangements.
- Strengthened requirements for supporting care-experienced interns.

12.5 RSHE Updates

- RSHE guidance updated with clearer expectations around:
 - Consent
 - Sexual harassment
 - Online safety (AI/information integrity)

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- Full implementation required by **September 2026**.

12.6 Governance Board Responsibilities

- Governors/Trustees must receive annual safeguarding training.
- The Governance Board must monitor the effectiveness of safeguarding systems.
- The Nominated Safeguarding Governor/Trustee retains specific oversight duties.

12.7 Data Protection

- Reinforced expectations around lawful information sharing.
- Special category data must be handled in line with statutory guidance.

Addendum – November 2025 Safeguarding Updates

This addendum outlines key safeguarding updates implemented following revisions to **Keeping Children Safe in Education (KCSIE) 2025**, updated government guidance, and strengthened expectations for safeguarding across education settings.

These updates apply from **September 2025** unless otherwise stated.

A1. Attendance – Now a Statutory Safeguarding Duty

Under *Working Together to Improve School Attendance (DfE 2025)*:

- Attendance is formally recognised as a safeguarding concern.
- The DSL must oversee the monitoring of all persistent and severe absence.
- Absence patterns must be escalated promptly and treated as potential indicators of harm.
- The Governance Board must monitor attendance as part of its safeguarding oversight.

A2. Alternative Provision (AP) Requirements

Providers of AP must now demonstrate:

- Robust safeguarding systems
- Clear attendance reporting
- Welfare updates shared with DISC at regular intervals
- Immediate notification where concerns arise

DISC must:

- Complete due diligence prior to placement
- Maintain ongoing checks throughout the placement
- Always consider AP suitability through a safeguarding lens

A3. Online Safety – Expanded Expectations

KCSIE 2025 strengthens expectations in response to the rapid evolution of digital risks.

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DISC must ensure:

- Filtering and monitoring systems meet DfE minimum expectations
- Staff and interns understand risks associated with:
 - Misinformation & disinformation
 - Online grooming & exploitation
 - Coercive online control
 - Emerging AI risks, including **deepfakes** and synthetic content
- Cyber-security training and risk management are embedded
- Digital literacy is taught through the curriculum

A4. Artificial Intelligence (AI) and Digital Integrity

New guidance emphasises:

- Recognising digitally manipulated media
- Understanding AI-driven grooming/harassment
- Protecting interns from harmful algorithmic content
- Raising awareness of AI-enabled deception

Staff must be trained to recognise these risks and respond appropriately.

A5. Virtual School Head (VSH) & Kinship Care Responsibilities

DISC must:

- Liaise regularly with the VSH on attendance, attainment and welfare
- Recognise specific vulnerabilities of interns in **kinship care arrangements**
- Ensure that staff understand and respond to the needs of care-experienced learners
- Include LAC and care-experienced interns in monitoring processes (attendance, wellbeing, progress)

A6. RSHE – Updated Guidance and Implementation Timeline

DfE requirements introduce strengthened RSHE expectations, including:

- Clearer teaching on consent and healthy relationships
- Enhanced focus on sexual harassment and online behaviours
- Education around digital citizenship and critical evaluation of online information
- Specific content on online risks, AI and harmful behaviours

Full implementation is required by **September 2026**.

A7. Governance Board Oversight

Under KCSIE 2025, the Governance Board must:

- Receive and review safeguarding reports regularly
- Ensure Governors/Trustees receive annual safeguarding training
- Oversee safer recruitment and SCR compliance
- Challenge and support the DSL in maintaining effective safeguarding arrangements
- Ensure filtering/monitoring systems are adequate

The **Nominated Safeguarding Governor/Trustee** maintains responsibility for governance-level scrutiny.

A8. Data Protection and Information Sharing

The addendum clarifies that:

- Safeguarding information must be shared lawfully and proactively
- Data protection must never prevent safeguarding action
- Special category data must be handled securely and proportionately
- Records must be transferred promptly when learners move settings

I HEREBY DECLARE THAT I HAVE READ AND REVIEWED THE ABOVE POLICY.

Safeguarding and Protection Policy

Signed: BJKenney

Date: 15/12/2025

First Reader

Bethany Kenney

Interim Safeguarding Governor

Signed: S. Hirst

Date: 14/12/2025

Second Reader

Sam Hirst

Chair of Governors