

LUMA EDUCATION

Safeguarding and Child Protection Policy: KCSIE 2026 updates

Document control	
Organisation	Care and Horizon Ltd trading as Luma Education
Company number	16692356
Applies to	Uxbridge, Hounslow, Willesden, Birmingham and any Luma Education centre, AP site, outreach or online provision
Policy owner	Designated Safeguarding Lead
Designated Safeguarding Lead	Aiden Bayati
Deputy Designated Safeguarding Lead	Sarah Ally
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Review date	September 2027, or earlier if statutory/local guidance changes or after any serious safeguarding incident

Safeguarding contacts and immediate action summary

This page is designed for staff, tutors and centre managers. It should be printed and displayed in staff-only areas and kept with induction materials.

Situation	Immediate action	Who must be informed
Child is in immediate danger, needs urgent medical help, or a crime is in progress	Call 999 immediately. Do not wait for the DSL if delay would increase risk.	DSL / Deputy DSL and Centre Manager as soon as safe to do so
Child protection concern, disclosure or unexplained injury	Listen, reassure, do not investigate, record facts, and report to the DSL immediately.	DSL / Deputy DSL. Referral to local children's social care/MASH/front door where threshold is met.
Concern about staff, tutor, director, volunteer, agency worker or contractor	Report to DSL/Director immediately. If the concern is about them, report to the alternative senior person or LADO route. Do not investigate before LADO advice where threshold may be met.	LADO within one working day where threshold is or may be met.
Low-level concern about adult conduct	Record and report promptly, even if no child appears to have been harmed.	DSL / Director. Patterns will be reviewed.
Unexplained absence from AP placement/session	Follow absence procedure, contact parent/carer and commissioning school/local authority, escalate if contact cannot be made or risk is known.	DSL and commissioning school/local authority where applicable.
Child missing from site or cannot be located	Start immediate site search, check registers/sign-out records, inform DSL/Centre Manager, contact parent/carer and commissioning school/local authority where applicable. Call police without delay if the child is not located promptly or risk is known.	DSL / Deputy DSL, Centre Manager, parent/carer, commissioning school/local authority and police where required.
Serious incident or emergency	Follow site emergency plan, preserve safety, call 999 where required, record facts and escalate to senior leadership.	DSL / Deputy DSL, Director, Centre Manager, parent/carer and commissioning school/local authority where applicable.

Role	Name / details
Designated Safeguarding Lead	Aiden Bayati
Deputy Designated Safeguarding Lead	Sarah Ally
Main telephone	020 3507 0057
Website	www.lumaeducation.co.uk
Emergency services	999 where a child is in immediate danger or urgent medical help is required

Local authority referral routes

These contact routes were checked against official local authority or safeguarding partnership pages on 10 June 2026. Local contact details can change; the DSL must check them at least termly and before any DPS submission.

Area	Children's social care / front door	LADO / allegations route
Hillingdon / Uxbridge	Stronger Families Hub: 01895 556006. Email for non-urgent advice: strongerfamilieshub@hillington.gov.uk . Child protection referrals should be phoned through and confirmed in writing the same day using the online process.	Use the Hillingdon LADO online contact form for consultation/referral. Open matters: LADO@hillington.gov.uk . Allegations meeting threshold should be reported within one working day.
Hounslow	Children's Services: 020 8583 6600, option 2 then option 3, Monday to Friday 9am to 5pm. Out of hours: 020 8583 2222.	Hounslow LADO: 020 8583 5730. Email: lado@hounslow.gov.uk .
Brent / Willesden	Brent Family Front Door: 020 8937 4300, option 1, Monday to Friday 9am to 5pm. Out of hours emergency duty team: 020 8863 5250. Professional urgent safeguarding advice line: 0208 937 2228.	Consult Brent LADO via Brent Family Front Door. LADO referrals are made using the Brent LADO referral form and sent to family.frontdoor@brent.gov.uk . Telephone: 020 8937 4300, option 1.
Birmingham	Children's Advice and Support Service (CASS): 0121 303 1888. Emergency out of hours: 0121 675 4806.	Birmingham LADO team: 0121 675 1669. Email: Ladoteam@birminghamchildrenstrust.co.uk .

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1. Policy statement and safeguarding commitment

Luma Education is committed to safeguarding and promoting the welfare of every child and young person who attends our centres, receives tuition, accesses alternative provision, attends assessments, participates in online learning, or receives any service from the organisation.

Safeguarding is everyone's responsibility. Every member of staff, tutor, volunteer, contractor, agency worker, consultant and director must act immediately where there is a concern about a child's welfare. The welfare of the child is paramount and will take priority over operational, reputational or commercial considerations.

Luma Education will not ignore, minimise or delay concerns. Safeguarding concerns will be recorded, reported and escalated in line with statutory guidance, London Safeguarding Children Procedures, and the relevant local authority pathway.

Luma Education seeks to create a safeguarding culture where children feel safe, listened to and able to raise concerns without fear. Leaders, tutors and staff are expected to model calm, respectful and professional behaviour and to treat every concern as important, even where the concern initially appears low-level or unclear.

Our safeguarding standard

Where there is uncertainty, staff must report the concern. It is better to report early and receive advice than to leave a concern unrecorded or unmanaged.

2. Scope of this policy

This policy applies across all Luma Education activities, whether delivered from a centre, partner site, school site, rented premises, online platform, outreach location or alternative provision placement.

- all children and young people under the age of 18;
- vulnerable young adults where our duty of care requires additional safeguards;
- tuition centre provision, alternative provision, SEND provision, assessments and holiday programmes;
- one-to-one tuition, paired tuition, small group tuition and online tutoring;
- all staff, tutors, directors, volunteers, contractors, agency workers, temporary workers and visitors.

The policy must be read with local procedures for Hillingdon, Hounslow, Brent/Willesden and Birmingham. Where a child lives in a different local authority area, the DSL will follow the children's social care pathway for that child's home authority, while also considering the authority where the incident occurred.

3. Legal and guidance framework

This policy has been drafted with regard to the following statutory and practice guidance:

- Keeping Children Safe in Education 2025;
- Working Together to Safeguard Children 2023;
- DfE Alternative Provision statutory guidance, including the 2025 updates;
- DfE non-school alternative provision voluntary national standards 2025, where relevant to commissioned AP quality assurance;
- DfE filtering and monitoring standards and cyber security standards for schools and colleges, where Luma Education provides or manages internet access, devices or online systems;
- London Safeguarding Children Procedures and Practice Guidance;
- local safeguarding children partnership procedures for Hillingdon, Hounslow, Brent and Birmingham;
- Prevent Duty guidance;

- out-of-school settings safeguarding guidance for providers;
- Children Act 1989 and Children Act 2004;
- Education Act 2002;
- Equality Act 2010;
- Data Protection Act 2018 and UK GDPR;
- Human Rights Act 1998;
- DBS, safer recruitment and employment guidance relevant to regulated activity.

Where statutory guidance or local authority procedures change, Luma Education will update this policy and inform staff of any material changes.

4. Safeguarding leadership and accountability

4.1 Designated Safeguarding Lead

The Designated Safeguarding Lead has lead responsibility for safeguarding and child protection. The DSL is responsible for receiving concerns, deciding next steps, making referrals, maintaining safeguarding records, liaising with agencies, supporting staff and monitoring safeguarding practice across Luma Education.

- maintaining oversight of safeguarding practice across all centres and AP provision;
- ensuring staff know how to identify, record and report concerns;
- making referrals to children's social care, MASH/front door services, police, Prevent/Channel or LADO where required;
- liaising with commissioning schools, local authorities, social workers, SENCOs, virtual schools and parents/carers where appropriate;
- ensuring the Single Central Record is maintained and safer recruitment checks are completed;
- reviewing safeguarding incidents, patterns, attendance concerns and quality assurance findings.

4.2 Deputy DSL and site safeguarding leads

The Deputy DSL acts when the DSL is unavailable and supports with record keeping, referrals, supervision, policy implementation and staff guidance. Each centre must have a clear safeguarding lead arrangement during operating hours so that staff are never unclear about who to contact.

4.3 Staff responsibilities

All staff must read this policy, follow the staff code of conduct, complete safeguarding induction, act immediately on concerns and maintain professional boundaries. Staff must never assume that someone else has reported a concern unless this has been confirmed and recorded.

5. Recognising abuse, neglect and specific safeguarding risks

Staff must remain alert to indicators of abuse, neglect, exploitation and harm. Abuse may be a single incident or a pattern of incidents. It may happen in the family, community, peer group, online, in education settings, in intimate relationships or through people in positions of trust.

Category	Examples of concerns staff must recognise
Core abuse categories	Physical abuse, emotional abuse, sexual abuse and neglect.
Exploitation and contextual risk	Child sexual exploitation, child criminal exploitation, county lines, serious youth violence, trafficking, modern slavery and gang-related harm.
Peer and relationship harm	Child-on-child abuse, bullying, cyberbullying, sexual harassment, harmful sexual behaviour, coercion, intimidation and sharing sexual images.

Category	Examples of concerns staff must recognise
Specific safeguarding issues	Domestic abuse, honour-based abuse, forced marriage, female genital mutilation, radicalisation, mental health concerns, self-harm, suicidal ideation, private fostering and children missing education.
Vulnerable learners	Children with SEND, EHCPs, communication needs, trauma history, exclusions, poor attendance, social care involvement, looked-after status or AP placements.

Children with SEND or communication needs may find it harder to disclose abuse. Staff must avoid assuming that behaviour, distress, absence or communication difficulties are simply linked to SEND without considering safeguarding risk.

5.1 Mental health and safeguarding

Mental health concerns should be considered within safeguarding practice. Mental health concerns may become safeguarding concerns where there is risk of abuse, neglect, exploitation, significant deterioration, suicidal ideation, self-harm, serious self-neglect or any other risk of significant harm. Staff are not expected to diagnose mental health conditions, but must record and report changes in presentation, concerning disclosures, repeated distress, self-harm indicators or behaviour that may show a child is unsafe.

Where a child presents with acute distress, serious self-harm risk or suicidal thoughts, the DSL must consider immediate safety planning, parent/carer contact where safe, medical advice, children's social care referral and/or emergency services depending on the level of risk.

6. Responding to disclosures, children's complaints and concerns

Staff must respond calmly and professionally. The role of staff is to listen, reassure, record and report. Staff must not investigate, challenge the alleged perpetrator, ask leading questions, promise confidentiality or delay reporting.

1. Listen carefully and allow the child to speak in their own words.
2. Reassure the child that they have done the right thing by telling someone.
3. Do not promise to keep information secret. Explain that information may need to be shared to help keep them safe.
4. Avoid leading questions. Use only open prompts such as "Tell me what happened" if clarification is needed.
5. Record the child's words as accurately as possible, including date, time, location, witnesses, observations and action taken.
6. Report the concern immediately to the DSL or Deputy DSL.
7. If a child is in immediate danger, call 999.

6.1 How children can raise concerns or complaints

Children and young people must be told, in a way they can understand, how to get help if they feel unsafe, worried, bullied, treated unfairly or not listened to. This information should be shared during induction, reinforced by staff, and displayed or made available in an age-appropriate format where possible.

A child may raise a concern with:

- any trusted adult at Luma Education;
- the DSL or Deputy DSL;
- their parent or carer, unless doing so would increase risk;
- their commissioning school, school DSL or SENCO;
- their social worker, virtual school worker or local authority officer, where involved;
- an advocate, independent visitor or other professional supporting them;
- NSPCC Childline on 0800 1111, where the child wants confidential support.

Staff must never dismiss a child's complaint because of age, SEND, communication needs, behaviour history or previous concerns. Concerns must be recorded, reported to the DSL and acted on in line with this policy. A child must not be punished, blamed or treated unfavourably for raising a concern in good faith.

Recording standard

Safeguarding records must be factual, timely, dated, signed and stored securely. Opinions should be avoided unless clearly identified as professional judgement with reasons.

7. Referrals, information sharing and escalation

Where a child may be at risk of significant harm, the DSL or Deputy DSL will contact the relevant local authority children's social care front door/MASH and follow local procedures. Emergency services must be contacted immediately where there is immediate danger or urgent medical need.

Luma Education will normally work openly with parents and carers and seek consent for early help referrals where appropriate. Consent will not be sought before sharing information where doing so may place the child at increased risk, place another person at risk, interfere with a police investigation, lead to intimidation, or create unsafe delay.

If staff believe that a concern has not been acted on appropriately, they must escalate. This may include the DSL, Director, local authority children's social care, LADO, police, NSPCC whistleblowing advice line or Ofsted where applicable.

8. Alternative provision safeguards and commissioning-school communication

For pupils placed with Luma Education as alternative provision, safeguarding must be planned before the placement starts and reviewed throughout the placement. Luma Education will work with the commissioning school, local authority, parent/carers and relevant professionals to make sure the placement is safe, suitable and properly monitored.

8.1 Information required before placement

- reason for placement and intended outcomes;
- safeguarding information and known risks;
- attendance history and children missing education concerns;
- behaviour history, exclusion/suspension history and risk of harm to/from peers;
- SEND needs, EHCP, reasonable adjustments and communication needs;
- medical needs, medication arrangements and emergency contacts;
- social worker, youth offending, virtual school or other professional involvement;
- transport, arrival and collection arrangements;
- online safety concerns and restrictions where applicable.

8.2 Placement planning

Each AP pupil should have a placement plan or learning plan setting out timetable, staffing ratio, subjects, named tutor/key worker, safeguarding controls, behaviour expectations, attendance reporting, communication arrangements, review dates and reintegration or progression aims.

8.3 Ongoing communication

Luma Education will keep the commissioning school and/or local authority informed of matters that affect safeguarding, attendance, suitability, risk or placement stability. Communication must be timely, factual and recorded. Urgent safeguarding matters must be communicated immediately and must not wait until the next review meeting.

For AP and commissioned placements, Luma Education will:

- notify serious incidents immediately, including incidents involving significant harm, police involvement, emergency services, serious behaviour risk or serious injury;
- notify safeguarding referrals to children's social care/MASH/front door, LADO, Prevent/Channel or police where this is necessary and lawful;
- notify unexplained absence, repeated absence, attendance deterioration and children missing from provision concerns in line with the agreed placement arrangement;
- notify placement breakdowns, risk escalation or any concern that the placement may no longer be safe, suitable or effective;
- share relevant updates about changes in risk, behaviour, wellbeing, peer concerns, online safety, transport or family circumstances where these affect the placement;
- attend professionals' meetings where appropriate, including placement reviews, safeguarding meetings and multi-agency planning meetings;
- contribute to Child Protection Conferences, Child in Need meetings, Team Around the Child (TAC) meetings, EHCP reviews and other statutory or professional meetings when requested and where relevant;
- keep a record of notifications, advice received, decisions made and actions agreed.

AP suitability safeguard

Luma Education will not accept or continue a placement where it cannot safely meet the child's needs, staffing ratio, risk profile or safeguarding requirements.

9. Attendance, absence and children missing from provision

Attendance will be recorded for every session. For alternative provision, attendance information must be shared with the commissioning school/local authority in line with the agreed placement arrangement.

Step	Action
1	Check the register, arrival record and any known authorised absence.
2	Contact parent/carer using agreed contact details.
3	Contact the commissioning school or local authority for AP pupils.
4	Escalate to the DSL where contact cannot be made, risk is known, or absence is unexplained/repeated.
5	Consider children's social care referral where absence creates or indicates safeguarding risk.
6	Record all actions, times, contacts and decisions.

10. Safer recruitment and suitability checks

Luma Education will use safer recruitment methods for all adults working with or around children. Recruitment decisions will consider safeguarding suitability as well as skills, qualifications and experience.

Recruitment stage	Minimum expectation
Advertising and application	Roles involving work with children will state safeguarding responsibilities. Applicants must provide employment history and explain gaps.
Shortlisting	Applications will be checked for unexplained gaps, inconsistent history and safeguarding suitability concerns.
Interview	Interviews will test safeguarding awareness, professional boundaries, suitability to work with children and role competence.

Recruitment stage	Minimum expectation
Pre-employment checks	Identity, right to work, enhanced DBS, barred list where applicable, references, qualification/professional status checks, overseas checks where required, and online checks where appropriate and proportionate.
Before unsupervised work	No person will work unsupervised with children until required checks are complete or a written risk assessment has been approved by senior leadership.
Post-appointment	Induction, probation, supervision, training and performance monitoring will be completed.

A Single Central Record will be maintained for relevant staff and checked regularly by senior leadership. Contractors and agency workers must not be allowed unsupervised access to children unless suitability has been verified and recorded.

11. Induction, training and supervision

All staff must complete safeguarding induction before working unsupervised with children. Training will be refreshed regularly and supplemented by safeguarding updates where guidance, risks or local arrangements change.

- this safeguarding and child protection policy;
- staff code of conduct and professional boundaries;
- how to identify and report concerns;
- DSL and Deputy DSL contact routes;
- allegations against staff and low-level concerns;
- whistleblowing routes;
- online safety and use of images;
- Prevent duty awareness;
- behaviour, de-escalation and physical intervention expectations;
- attendance and children missing from provision procedures;
- site security, emergency and first aid procedures.

Tutors and staff working with AP pupils, SEND pupils or higher-risk learners will receive role-specific guidance and supervision. Supervision may include lesson observations, quality reviews, safeguarding check-ins, incident review, attendance review and review of professional conduct.

12. Staff conduct and professional boundaries

Staff must maintain safe, respectful and professional relationships with students at all times. Staff must avoid conduct that could be misinterpreted, create dependency, blur boundaries or place either the child or adult at risk.

Staff must not	Expected professional practice
Be alone with a child in an isolated or unobservable space unless authorised and risk assessed.	Use visible rooms, open-door arrangements, regular supervision checks or another suitable control for 1:1 work.
Use personal phone numbers, personal email or personal social media to contact students.	Use approved communication channels and include parents/carers or organisational systems where required.
Take photographs or videos of children on personal devices.	Use approved devices and obtain appropriate consent for images.
Use sexualised, humiliating, discriminatory, aggressive or intimidating language.	Use calm, respectful, age-appropriate and professional communication.

Staff must not	Expected professional practice
Transport students in private vehicles without approval.	Only transport students where authorised, insured, risk assessed and agreed with parents/carers and commissioning school/local authority where applicable.
Investigate safeguarding concerns or challenge alleged perpetrators.	Record and report concerns to the DSL immediately.

Any situation that could be misinterpreted must be reported to the DSL and recorded as soon as possible.

13. One-to-one tuition, online provision, site safety and emergency planning

13.1 One-to-one tuition

One-to-one work may be necessary, particularly for AP and SEND pupils, but it must be delivered with clear safeguards. Rooms should have visibility where possible, doors should not be locked, and site leads should carry out reasonable supervision checks.

13.2 Online provision

Online tutoring must be delivered through approved platforms and accounts. Staff must not use personal accounts, private messaging or unapproved social media to teach or communicate with students. Online sessions should be scheduled, recorded where policy permits, and supervised or reviewable where appropriate.

13.3 Site security

Visitors must sign in and out, provide identification where required, wear a visitor badge and remain supervised unless authorised. External doors and access points must be monitored. Students must remain in supervised areas unless authorised.

Toilets should be safely accessible while respecting privacy and dignity. Staff should be aware of student movement and patterns that may indicate risk, bullying, avoidance or distress.

13.4 Emergency planning and serious incident response

Each Luma Education site must maintain proportionate emergency arrangements suitable for its premises, learner profile and operating hours. Staff must know the local arrangements before supervising children.

- Evacuation arrangements must identify exits, assembly points, registers, first aid arrangements, visitor controls and support for children with SEND, mobility, communication or anxiety needs.
- Lockdown procedures must be available for credible threats where remaining inside or restricting movement is safer than evacuation. Staff must follow senior leadership instructions and emergency service advice.
- Missing child from site procedures must set out immediate search, register check, escalation to the DSL/Centre Manager, parent/carers and commissioning school/local authority contact, and police contact where the child cannot be located promptly or risk is known.
- Serious incident response arrangements must cover medical emergencies, violence, weapon concerns, fire, building failure, serious safeguarding incidents, transport incidents, online safety incidents and business continuity issues.
- Emergency incidents, drills, near misses and learning points must be recorded and reviewed by senior leadership. Safeguarding learning must be added to staff briefings, risk assessments or policy updates where required.

14. First aid, physical contact and intimate care

Staff should avoid unnecessary physical contact. Positive reinforcement should normally be non-contact, such as praise, certificates, stickers, clapping, smiles and thumbs-up gestures.

If a child seeks physical comfort, staff should respond sensitively and professionally, taking account of the child's age, needs, vulnerability and context. Staff must avoid prolonged or unnecessary physical contact.

First aid should be administered by trained first aiders where possible. Incidents must be recorded and parents/carers informed where appropriate. Where suitable, children may be encouraged to apply plasters or cold compresses themselves under supervision.

Any intimate care or personal care needs must be risk assessed, agreed with parents/carers and, where relevant, the commissioning school/local authority, and recorded in an individual care plan.

15. Behaviour, de-escalation and physical intervention

Luma Education promotes calm, predictable and respectful behaviour management. Staff should use prevention, clear expectations, positive relationships and de-escalation before sanctions or physical intervention are considered.

Physical intervention must only be used as a last resort where necessary to prevent injury, serious damage or serious risk. Any intervention must be reasonable, proportionate, recorded and reported to the DSL and Centre Manager immediately. Parents/carers and commissioning schools/local authorities must be informed where appropriate.

AP pupils with known behaviour risks should have an individual risk assessment and behaviour support plan. Staff must consider SEND, trauma, communication needs and reasonable adjustments before concluding that behaviour is deliberate misconduct.

16. Gender-questioning children

- All requests for support or changes connected with a child questioning their gender must be referred to the DSL;
- staff must listen respectfully and must not make promises about confidentiality;
- decisions must be made individually, taking account of safeguarding, privacy, dignity and the effect on other children;
- parents or carers should normally be involved as a priority;
- where informing parents could place the child at greater risk, the DSL must complete and record a safeguarding risk assessment before any contact is made;
- individual staff must not independently promise changes to names, pronouns, toilets, changing arrangements, records or communications with parents. KCSIE 2026 includes substantially expanded guidance on gender-questioning children and says parents should generally be involved unless doing so creates a greater safeguarding risk.

17. Misogyny and harmful sexual behaviour

- misogyny, sexism, sexual harassment and harmful sexual behaviour are safeguarding concerns;
- behaviour must never be dismissed as banter, joking, "boys being boys" or part of growing up;
- every concern must be recorded and reported to the DSL;
- the DSL must consider immediate protective measures, a risk and needs assessment and whether referral to children's social care or the police is required;
- patterns involving the same child, group, location or type of behaviour must be reviewed;
- support must be considered for both the child harmed and any child displaying harmful behaviour.

KCSIE 2026 strengthens the connection between misogyny, harmful sexual behaviour, sexual harassment and escalation to more serious abuse.

18. AI-generated and manipulated images

- creating, requesting, possessing or sharing AI-generated nude or sexual images of children is treated as a safeguarding incident;
- Staff must not download, copy, print, forward or share the image;
- the concern must be reported immediately to the DSL;
- staff must not investigate by searching a child's device or asking the image to be resent;
- the DSL must follow the organisation's child-on-child abuse, image-sharing and referral procedures;
- use of AI to humiliate, sexually harass, impersonate or exploit a child must be recorded and risk-assessed.

KCSIE 2026 expressly includes AI-generated nudes and semi-nudes within child-on-child abuse and image-sharing procedures.

19. Child-on-child abuse

Luma Education recognises that children can abuse other children. This policy applies to all child-on-child concerns, whether they happen inside the centre, online, outside the centre or during AP arrangements.

- bullying and cyberbullying;
- physical assault or threats;
- sexual harassment, sexual violence or harmful sexual behaviour;
- coercion, intimidation, humiliation or control;
- sharing or threatening to share sexual images;
- discriminatory abuse linked to race, religion, disability, sex, sexual orientation or other protected characteristics;
- peer pressure, initiation or hazing behaviours.

Staff must not dismiss harmful behaviour as “banter”, “children being children” or “part of growing up”. Victims will be supported, alleged perpetrators managed safely, and referrals made where required. Peer grouping and room allocation will be risk assessed for AP and SEND pupils where needed.

20. Online safety, filtering, monitoring and use of images

Children may be exposed to online risks including grooming, exploitation, cyberbullying, harmful content, radicalisation, sexual imagery, scams and privacy risks. Online safety is part of safeguarding and must be considered in centre-based and online provision.

Online safety applies to centre-based tuition, online tuition, staff devices, learner devices, Wi-Fi, communication platforms, images, records and any digital system used to support children. The DSL retains oversight of online safeguarding concerns and must be informed of any online incident that may involve grooming, exploitation, harmful content, bullying, sexual imagery, radicalisation, data breach, device misuse or staff boundary concerns.

20.1 Filtering and monitoring

Where Luma Education provides or manages internet access, devices, accounts or online learning systems, proportionate filtering and monitoring arrangements must be in place. Where provision takes place on a commissioning school site or other partner site, the site's filtering and monitoring arrangements should be confirmed where relevant to the placement.

Area	Minimum expectation
Filtering arrangements	Prevent access to illegal, inappropriate and harmful content so far as reasonably possible, including harmful sexual content, extremist content, self-harm content, violence, gambling and other age-inappropriate material.

Area	Minimum expectation
	Filtering must be reviewed when systems, premises or provision change.
Monitoring systems	Monitoring should allow concerns to be identified, reported to the DSL and linked to a user where possible. Monitoring alerts or reports must be reviewed by an appropriate person and safeguarding concerns must be recorded.
Guest/BYOD access	Learners should not be given unrestricted unsupervised internet access. Personal devices must be managed through centre rules, supervision and risk assessment.
Cyber security	Systems must use secure accounts, strong passwords where appropriate, restricted access to safeguarding records, prompt removal of leavers' access, software updates and incident reporting for suspected cyber or data breaches.
Review evidence	Filtering, monitoring and cyber security checks should be recorded as part of safeguarding quality assurance and reviewed after any online safety incident.

20.2 Acceptable use expectations

Staff and learners must follow acceptable use expectations. These expectations are designed to protect children, protect staff from boundary risks and create clear evidence that online systems are being managed responsibly.

- staff must use approved platforms, approved accounts and organisational systems for teaching and communication;
- staff must not use personal social media, personal phone numbers, personal email accounts or private messaging to contact learners;
- learners must use devices and internet access only as permitted by centre rules, tutor instructions and placement plans;
- photographs and videos must not be taken on personal devices and must only be used with appropriate consent and secure storage;
- online sessions should be scheduled, supervised or reviewable where appropriate, and delivered in a way that preserves professional boundaries;
- online safety concerns may be referred to police, CEOP, children's social care, Prevent/Channel or the commissioning school/local authority where appropriate.

21. Prevent duty and contextual safeguarding

Staff must be alert to signs that a child may be vulnerable to radicalisation or extremist influence. Prevent concerns are safeguarding concerns and must be reported to the DSL. The DSL will decide whether to seek advice or make a Prevent/Channel referral in line with local procedures.

Contextual safeguarding means considering risks outside the family, including peer groups, local areas, gangs, online spaces, transport routes and community locations. AP pupils may have complex contextual risks, so placement planning must consider more than academic needs.

22. Allegations against staff and workplace safeguarding

This section applies to concerns about any adult working with or around children, including staff, tutors, directors, volunteers, agency staff, contractors, visitors, consultants and self-employed workers.

Any allegation or concern that an adult has behaved in a way that has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child, behaved in a way that indicates they may pose a risk of harm to children, or behaved in a way that indicates they may not be suitable to work with children must be reported immediately.

Principle	Requirement
Immediate reporting	Report to the DSL and Director unless the concern is about them, in which case report to the alternative senior person or directly through the LADO route.
LADO timescale	Seek LADO advice within one working day where the threshold is or may be met.
No premature investigation	Do not investigate internally or question the alleged adult before LADO advice where threshold may be met.
Immediate risk	Call police or children's social care immediately where a child is at immediate risk.
Employment action	Suspension is not automatic. Risk controls, supervision, redeployment or suspension will be considered based on risk, LADO advice and employment law.
External referrals	DBS, professional body, TRA, police or other referrals will be made where required.

Records of allegations will include the allegation, date/time, who reported it, immediate action, LADO advice, decisions and reasons, outcome and any external referrals.

23. Low-level concerns and whistleblowing

23.1 Low-level concerns

A low-level concern is any concern about an adult's behaviour towards a child that does not appear to meet the allegation threshold but may still be inconsistent with the staff code of conduct. This includes over-familiarity, favouritism, unnecessary one-to-one contact, inappropriate language, personal communication, or boundary drift.

All low-level concerns must be recorded and reported to the DSL or Director. The purpose is to identify patterns early, protect children and support staff to maintain professional standards.

23.2 Whistleblowing

Staff must report safeguarding concerns without fear of retaliation. If a member of staff believes concerns are not being addressed properly, they may escalate to the Director, local authority children's social care, LADO, police, Ofsted where applicable, or the NSPCC whistleblowing advice line.

Luma Education will not tolerate victimisation of anyone who raises a safeguarding concern in good faith.

24. Record keeping, confidentiality and quality assurance

Safeguarding information is confidential but must be shared where necessary to protect a child. Data protection must never be used as a reason to avoid sharing information where a child is at risk of harm.

- records must be factual, dated, signed and stored securely;
- records should be kept separate from general student files where appropriate;
- staff must not keep safeguarding information in personal notebooks, personal devices or private accounts;
- information must only be shared with those who need to know;
- safeguarding records must be transferred securely where appropriate;

- decisions not to refer must be recorded with reasons.

Safeguarding quality assurance must be active, evidenced and reviewed by senior leadership. The purpose of quality assurance is to improve child safety, identify patterns early, support staff practice and provide a clear record that Luma Education is monitoring compliance with this policy.

24.1 Safeguarding quality assurance framework

Quality assurance activity	Minimum frequency	Evidence to keep
Annual safeguarding audit	Annually and sooner after a serious incident or major guidance change	Completed audit, action plan, named owners, completion dates and Director/Board review. Audit should cover policy, training, DSL capacity, AP files, attendance, record keeping, site safety, online safety, safer recruitment and learner voice.
Termly safeguarding report to Board/Directors	Termly	Anonymised report covering incidents, referrals, allegations/low-level concerns, attendance/CME concerns, AP placement risks, training compliance, SCR checks, online safety, complaints, themes, actions and unresolved risks.
Single Central Record audit	At least termly and after recruitment waves	SCR audit record, missing checks log, corrective action and sign-off by DSL/senior leadership. No adult should work unsupervised until required checks are complete or risk assessed.
Safeguarding supervision for DSL/Deputy DSL	Regularly, and additionally after complex cases	Supervision notes, actions, escalation decisions, support needs, workload/capacity review and learning points. External safeguarding advice should be sought where internal expertise is insufficient.
Ongoing policy compliance monitoring	Ongoing through the year	Induction records, training matrix, staff declarations, lesson/site observations, safeguarding file checks, incident reviews, attendance reviews, low-level concern reviews and learner/parent feedback.
Professional meeting participation	As requested or required by risk	Attendance notes and actions from Child Protection Conferences, Child in Need meetings, TAC meetings, EHCP reviews and AP placement reviews.

Where quality assurance identifies gaps, the DSL and senior leadership must record the issue, assess risk, allocate an action owner and review completion. Repeated non-compliance by staff must be managed through supervision, retraining, capability, disciplinary or suitability procedures as appropriate.

25. Review, approval and staff declaration

This policy will be reviewed annually and sooner if statutory guidance, London Safeguarding Children Procedures, local authority arrangements, AP commissioning requirements, organisational structure or provision changes. Learning from safeguarding incidents will be used to improve practice.

Appendix A: Local safeguarding contacts

The DSL must check and update this appendix at least termly and before any DPS or local authority submission. Emergency action must never be delayed because a form or contact route is being checked.

Local authority	Referral route	Notes for Luma Education
Hillingdon	Stronger Families Hub: 01895 556006. Non-urgent advice: strongerfamilieshub@hillingdon.gov.uk. Child protection referrals should be phoned and confirmed in writing the same day.	Use for Uxbridge centre/AP pupils linked to Hillingdon. LADO contact through online contact form; open matters via LADO@hillingdon.gov.uk.
Hounslow	Children's Services: 020 8583 6600, option 2 then option 3. Out of hours: 020 8583 2222.	Use for Hounslow centre/AP pupils or Hounslow resident children. LADO: 020 8583 5730; lado@hounslow.gov.uk.
Brent / Willesden	Brent Family Front Door: 020 8937 4300 option 1. Out of hours: 020 8863 5250. Professional urgent advice line: 0208 937 2228.	Use for Willesden provision. LADO referrals through Brent LADO referral form to family.frontdoor@brent.gov.uk or consult via 020 8937 4300 option 1.
Birmingham	CASS: 0121 303 1888. Emergency out of hours: 0121 675 4806.	Use for Birmingham centre/AP pupils. LADO: 0121 675 1669; Ladoteam@birminghamchildrenstrust.co.uk.

Appendix B: Core reference guidance reviewed

The policy has been prepared against the following guidance sources and local pathways. This appendix is included to evidence the basis of the policy during DPS/local authority review.

Source	Relevance
Keeping Children Safe in Education 2025, Department for Education	Statutory safeguarding and safer recruitment guidance for schools and colleges; used as the benchmark for safeguarding culture, DSL role, safer recruitment, allegations, child-on-child abuse, online safety and staff conduct.
Working Together to Safeguard Children 2023, Department for Education	Multi-agency statutory safeguarding guidance; used for referral, information sharing, partnership working and safeguarding responsibilities for organisations working with children.
Alternative Provision statutory guidance, Department for Education, updated February 2025	Used for AP placement safety, suitability, attendance, quality assurance, local authority/school commissioning and independent providers delivering AP.
London Safeguarding Children Procedures and Practice Guidance	Used for London procedures, including CP7 allegations against staff or volunteers and LADO expectations.
Hillingdon Stronger Families Hub and LADO guidance	Used for Hillingdon child protection referral route and allegations route.
Hounslow, Brent and Birmingham local safeguarding routes	Used for centre-specific referral routes and local LADO contact arrangements.
DfE filtering and monitoring standards and cyber security standards	Used to strengthen online safety, filtering, monitoring, acceptable use and cyber security expectations where Luma Education provides or manages internet access, devices or online systems.

Source	Relevance
DfE non-school alternative provision voluntary national standards 2025	Used as a good-practice benchmark for commissioned AP oversight, quality assurance, learner safety, attendance, suitability and provider accountability.

Approval page

This page should be completed by senior leadership before the policy is issued to staff or uploaded for DPS/local authority due diligence.

Approval item	Details
Approved by	Aiden Bayati
Role	Director / DSL
Signature	<i>Aiden Bayati</i>
Approval date	
Next review date	September 2027 or earlier if guidance changes or safeguarding learning requires amendment
Distribution	All staff, tutors, volunteers, agency staff, contractors, directors and commissioning partners on request