

Child Protection and Safeguarding Policy

2026-2027

Organisation	Century Training Academy Ltd
Document type	Policy
Version	3.1 updated for Keeping Children Safe in Education 2026 compliance, September 2026 (supersedes Version 3.0, August 2026)
Reviewed	20 August 2026
Next review	20 August 2027

1. Policy Statement

Century Training Academy Ltd is committed to safeguarding and promoting the welfare of children and young people. This policy applies to all learners under the age of 18 and, where appropriate, vulnerable adults engaged in provision. The academy is an Alternative Provision provider and recognises that learners may present with additional safeguarding, SEND, SEMH, attendance, contextual, behaviour and vulnerability risks.

All staff, contractors and volunteers must act immediately where they have a concern about a child. Safeguarding is everyone's responsibility. The welfare of the child is paramount.

2. Designated Safeguarding Roles

Role	Name / Contact	Responsibilities
Lead Designated Safeguarding Lead (DSL)	Daniel Gallagher – daniel@centurytraining.co.uk	Lead child protection, referrals, advice to staff, records, liaison with schools, local authorities, police and safeguarding partners.
Deputy DSL	Callum Black callum@centurytraining.co.uk Emma Brammall - emma@centurytraining.co.uk	Deputise for the DSL and support safeguarding oversight, recording, escalation and commissioner communication.
Director / Proprietor	Stephen Black / Directors – steve@centurytraining.co.uk	Ensure safeguarding systems, safer recruitment, training, resources, oversight and policy review.
Norfolk Children's Services	0344 800 8020	Referral and advice where a child is at risk of harm.
Norfolk LADO	0344 800 8020/01603 223473	Advice and management of allegations against staff, contractors, volunteers or adults working with children.
Suffolk Customer First	0808 800 4005 (freephone). Referrals via the Suffolk Children and Young People's Portal (MARF).	First point of contact for all child safeguarding referrals in Suffolk. Out of hours the number diverts to the Emergency Duty Service.
Suffolk MASH Professional Consultation Line	0345 606 1499 (Mon-Thu 9am-5pm, Fri 9am-4:25pm). Webchat via www.suffolksp.org.uk	For professionals to consult a MASH social worker where it is unclear whether a referral is required.
Suffolk LADO	LADO@suffolk.gov.uk / 0300 123 2044	Advice and management of allegations against staff, contractors, volunteers or adults working with children in Suffolk. Must be contacted within one working day.
Suffolk CME Team	cme@suffolk.gov.uk / 01473 265224	Reporting and advice where a child living in Suffolk may be missing education.

Century Training Academy Ltd receives referrals from schools and commissioners in both Norfolk and Suffolk. Staff must follow the safeguarding reporting procedures of the local authority in which the child lives. Where a child lives

in Suffolk, concerns are referred to Suffolk County Council through Customer First and the Children and Young People's Portal, with the MASH Professional Consultation Line available to professionals who are unsure whether a referral is needed, and allegations against adults working with children are reported to the Suffolk LADO within one working day. Where a child lives in Norfolk, Norfolk County Council procedures apply. If the responsible authority is unclear, the DSL will seek advice before referring and will never delay action where a child is at immediate risk. In an emergency, always call 999.

3. Scope

- Employees, directors, tutors, assessors, contractors, agency staff, volunteers and visitors.
- All learners attending on any timetable or commissioned placement.
- On-site, off-site, online, transport-related and work-related learning activities.
- Activities commissioned by schools, local authorities, parents/carers or other agencies.

4. Core Safeguarding Principles

- Children must be protected from maltreatment, abuse, neglect and exploitation.
- Concerns must be recorded accurately and reported to the DSL as soon as possible on the same day.
- Staff must not investigate concerns themselves; they must listen, reassure, record and report.
- Staff must maintain appropriate professional boundaries and follow the staff code of conduct.
- The academy will work in partnership with parents/carers, referring schools, local authorities and safeguarding partners, unless doing so would increase risk to a child.
- Information sharing will be proportionate, lawful and in the child's best interests.

5. Staff Training and Reading

- All staff must read and confirm that they understand Part One of Keeping Children Safe in Education 2026.
- All staff must receive safeguarding induction before working unsupervised with learners.
- The DSL and Deputy DSL must complete formal DSL training at least every two years, with training dates, content and renewal due dates recorded at Appendix A.
- All staff must receive annual safeguarding updates covering child-on-child abuse, sexual violence and harassment, online safety, low-level concerns, Prevent, attendance/missing learners and contextual safeguarding.
- Records of safeguarding training and staff declarations must be retained.

6. Recognising Abuse, Neglect and Exploitation

Staff must be alert to indicators of abuse, neglect and exploitation, including but not limited to physical abuse, emotional abuse, sexual abuse, neglect, domestic abuse, child sexual exploitation, child criminal exploitation, county lines, serious youth violence, radicalisation, online harm, self-harm, mental health concerns, harmful sexual behaviour, bullying and discriminatory abuse.

7. Reporting Concerns

1. If a child is in immediate danger or at risk of immediate harm, call 999 and inform the DSL as soon as it is safe to do so.
2. For all safeguarding concerns, report to the DSL or Deputy DSL immediately and on the same day.
3. Record the concern factually, using the child's own words where possible. Include date, time, location, who was present, what was seen/heard and what action was taken.

4. Do not promise confidentiality. Explain that information may need to be shared to keep the learner safe.
5. If the DSL is unavailable and there is risk of harm, staff must contact Children's Services or the police directly and inform the DSL as soon as possible.
6. Where a learner is referred by a school or local authority, the DSL must notify the commissioner/referring safeguarding lead where appropriate.
7. Where a safeguarding concern involves the referring school, local authority or other commissioner itself, or there is any other conflict of interest in reporting through the usual channel, the DSL reports directly to the relevant LADO (Norfolk or Suffolk, as applicable) instead, and records why the usual route was not used.

8. Child-on-Child Abuse, Sexual Violence and Sexual Harassment

The academy has a zero-tolerance approach to child-on-child abuse. Abuse will never be dismissed as banter, horseplay, part of growing up or normal behaviour. Concerns must be recorded and risk assessed. Victims will be supported, alleged perpetrators will be managed in a way that protects all children, and commissioners/referring schools will be involved where appropriate.

- Examples include bullying, cyberbullying, sexual harassment, sexual violence, upskirting, initiation/hazing, coercive behaviour, prejudice-based abuse, harmful sexual behaviour and online abuse.
- Upskirting is the act of taking a photograph or video, or otherwise recording an image, beneath a person's clothing without their consent or a reasonable belief in their consent, in order to view their genitals, buttocks or underwear (whether or not covered by underwear), for the purpose of obtaining sexual gratification or of causing humiliation, distress or alarm. It is a criminal offence under the Voyeurism (Offences) Act 2019, which inserted sections 67A and 67B into the Sexual Offences Act 2003. It applies to victims and perpetrators of any sex or gender, can be committed anywhere including in public, and carries a maximum sentence of two years' imprisonment with the possibility of the offender being placed on the sex offenders register. Any incident or disclosure of upskirting involving a learner must be reported to the DSL immediately and will be treated as both a safeguarding and a criminal matter.

9. Online Safety

Online safety is part of safeguarding. Staff must report concerns about online abuse, image sharing, grooming, cyberbullying, extremist content, harmful content, misuse of devices, AI misuse where safeguarding-related, or contact between learners and adults outside professional boundaries.

Although learners do not have access to the internet while on site, online safety remains part of our safeguarding responsibility. We promote ongoing awareness of online risk and support learners to stay safe outside of provision. Staff, learners and parents are made aware of the four areas of risk identified in Keeping Children Safe in Education:

- Content: being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users, for example peer-to-peer pressure, commercial advertising, cyberbullying, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (including consensual and non-consensual sharing of nude and semi-nude images or videos, and digitally manipulated or AI-generated images such as deepfakes), sharing other explicit images, and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams. Where staff feel a learner or member of staff is at risk, this should be reported to the DSL and, where appropriate, to the Anti-Phishing Working Group.

Following Keeping Children Safe in Education 2026, the effectiveness of filtering and monitoring arrangements covering all internet-connected devices used on the premises, including staff devices, is reviewed at least once every academic year by [Director to nominate], the senior leader responsible for filtering and monitoring, working with the DSL and any IT support, with the outcome reported to and signed off by the Directors.

Online safety awareness is embedded in tutorials and vocational delivery, and is revisited with learners whose individual risk assessments identify online vulnerability. Staff must report any concern about a learner's online activity, whether it occurs on site or outside provision, to the DSL without delay.

10. Prevent Duty

Staff must be alert to signs of radicalisation or extremist influence and must report concerns to the DSL. The DSL will consider local Prevent referral arrangements and seek advice where necessary.

11. Attendance and Missing Learners

The academy will monitor attendance for each learner and notify the referring school/commissioner and parent/carer of absence, non-arrival, unexplained absence, late arrival or early departure in line with agreed placement arrangements. A learner will not be sent home without safe handover arrangements and commissioner/referring school awareness where the learner is of compulsory school age.

Attendance is reported to the referring school or commissioner within 30 minutes of a learner's planned arrival time, covering non-arrival, late arrival and early departure. Attendance is reviewed with the commissioner at least every six weeks, and sooner where a concern arises, so that any barrier to attendance can be addressed jointly with the commissioner, the learner and their parents or carers.

12. Allegations Against Staff and Low-Level Concerns

Any allegation that a member of staff, contractor, volunteer or adult working with children may have harmed a child, behaved in a way that indicates risk of harm, committed a criminal offence against or related to a child, or behaved in a way that may not be suitable to work with children must be reported immediately to the Director/Proprietor and DSL. Where the allegation concerns the DSL, it must be reported directly to the Deputy DSL or the LADO. Where the allegation concerns the Director, Century Training Academy Ltd has no second Director or internal board able to receive it independently, so it must be reported directly to the LADO, who provides the independent route in this circumstance.

Low-level concerns, including conduct that does not meet the harm threshold but may be inconsistent with the staff code of conduct, must be reported and recorded so patterns can be identified.

13. Safer Recruitment

- Appropriate identity, right to work, qualification, employment history and reference checks will be completed.
- Enhanced DBS checks with barred list checks will be obtained where the role is regulated activity.
- Following the Crime and Policing Act 2026, volunteers who teach, train, instruct or supervise learners frequently require an enhanced DBS check with children's barred list information regardless of supervision arrangements, as the previous supervision exemption has been removed.
- Online searches may be carried out as part of due diligence for shortlisted candidates where appropriate.
- A single central record or equivalent safer recruitment record will be maintained.
- Contractors and visitors will be supervised or checked in line with their level of contact with learners.

14. Confidentiality and Information Sharing

Safeguarding information will be shared on a need-to-know basis where it is necessary to protect a child, support welfare, comply with legal obligations or meet commissioner/referring school responsibilities. Data protection law does not prevent sharing information where it is necessary to safeguard a child.

15. Linked Documents

- Staff Code of Conduct
- Behaviour Policy
- Anti-Bullying Policy
- Attendance and Missing Learner procedures
- Data Protection Policy
- CCTV Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- First Aid and Medication procedures
- Lone Working Policy
- Risk Assessment templates

Record Keeping

Records created under this document must be accurate, factual, dated and stored securely. Access must be limited to staff with a legitimate operational, safeguarding, health and safety, quality assurance or legal reason to view the information. Records must be retained in line with Century Training Academy Ltd's retention schedule and UK GDPR requirements.

Monitoring and Review

This document will be reviewed at least annually, with the next scheduled review on 20 August 2027. It will also be reviewed sooner if legislation, statutory guidance, awarding body requirements, local authority expectations, premises, provision or operating arrangements change.

Key Guidance and Linked Requirements

- Keeping Children Safe in Education 2026 (DfE), in force from 1 September 2026.
- Non-school Alternative Provision: Voluntary National Standards (DfE).
- UK GDPR and Data Protection Act 2018.
- Equality Act 2010.
- Health and Safety at Work etc. Act 1974 and relevant HSE guidance.
- Working Together to Safeguard Children 2026 (HM Government).
- Prevent duty guidance - current edition.
- Crime and Policing Act 2026, in relation to regulated activity and the removal of the supervision exemption for volunteers.
- Voyeurism (Offences) Act 2019 and Sexual Offences Act 2003, sections 67A and 67B (upskirting).
- Suffolk Safeguarding Partnership procedures: www.suffolksp.org.uk (Customer First, MASH and LADO).
- Norfolk Safeguarding Children Partnership procedures.

Appendix A: Designated Safeguarding Lead and Deputy Training Record

Standard 1.5 of the Non-school Alternative Provision: Voluntary National Standards requires the named child safeguarding lead to undergo documented training that gives them the knowledge and skills to carry out the role, renewed at least every two years, with the Deputy Designated Safeguarding Lead receiving the same training as the primary lead. This is separate from, and in addition to, the annual whole-staff safeguarding update at Section 5.

Name	Role	Date of training	Provider / course	Content covered	Renewal due (max. 2 years)
Daniel Gallagher	DSL				
Emma Brammall	Deputy DSL				

Reviewed by the Directors at each annual policy review to confirm no renewal is overdue.

Sign Off

Name	Stephen Black
Position	Director
Date	20 August 2026