POLICY 01 | 2026-27

Safeguarding adults and child protection

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

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Approved by: Martha Bache, Director and Proprietor | Next review: By 1 September 2027, or earlier if required.

1 Policy statement and status

Crea Pax is an alternative education provision supporting children, young people and adult learners with social, emotional, mental health and special educational needs. Crea Pax provides therapeutic interventions and a therapeutically informed approach; it does not provide formal therapy as part of its commissioned alternative provision.

For children under 18, Crea Pax adopts Keeping Children Safe in Education 2026 (KCSIE) as its operating safeguarding baseline, together with Working Together to Safeguard Children 2026, current information-sharing guidance, local safeguarding partnership procedures, contractual requirements and relevant law. For learners aged 18 and over, Crea Pax also applies the Care Act 2014 adult safeguarding framework and the Mental Capacity Act 2005 where relevant.

Safeguarding is everyone’s responsibility. Crea Pax works in a child- and learner-centred, trauma-informed, relational, inclusive and professionally curious way. Wishes, feelings and communication needs are taken seriously without allowing delay where protection is required.

Commissioning responsibility Placement at Crea Pax does not remove the commissioning school’s, college’s or local authority’s safeguarding duties. Crea Pax and the commissioner agree information-sharing, attendance, emergency, family-contact and review arrangements before or at placement start.

2 Scope and key definitions

This policy applies to the proprietor, employees, agency and contracted workers, apprentices, trainees, students on placement, volunteers, visitors and any adult working for or representing Crea Pax, on site, online, during transport or during off-site activity.

- A child is anyone under 18.
- An adult learner is a learner aged 18 or over. Adult safeguarding duties are considered where the adult has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves from the abuse, neglect or risk.
- Safeguarding concerns are acted upon regardless of where or when the alleged harm occurred. Concerns may also relate to an unborn baby.
- All adults working with children must read KCSIE 2026 Part One in full. Any quick-reference overview supports recall but does not replace Part One.

This policy should be read alongside Crea Pax arrangements for staff behaviour/code of conduct, allegations and low-level concerns, whistleblowing, online safety and devices, attendance, behaviour and positive handling, SEND, health and safety, first aid and medication,

personal care where applicable, complaints, data protection/information sharing, safer recruitment, risk assessment and off-site activities.

3 Key safeguarding contacts

Role	Contact
Proprietor and DSL	Martha Bache • 07730 476738 • martha@creapax.com
Deputy DSL	Stephanie Selby • steph@creapax.com
Alternative senior contact if concern is about proprietor	Stephanie Selby (DDSL) - steph@creapax.com
Wiltshire Integrated Front Door (children)	0300 456 0108 • out of hours 0300 456 0100
Wiltshire Adult Social Care / safeguarding	0300 456 0111 • out of hours 0300 456 0100
Wiltshire LADO	LADO@wiltshire.gov.uk
Dorset Family Support & Advice Line (children)	01305 228558 • out of hours 01305 221000
Dorset Adult Safeguarding	01305 221016 • out of hours 01305 221000
Dorset LADO	01305 221122 • lado@dorsetcouncil.gov.uk
Immediate danger or crime in progress	999 • otherwise police 101 as appropriate
NSPCC Whistleblowing Advice Line	0800 028 0285 • help@nspcc.org.uk

Local contact details, thresholds and referral routes are checked at least annually and before reliance. The learner’s home authority, commissioning authority and school/setting may have different notification routes; the DSL records which route applies. Adult safeguarding routes are similarly checked for the relevant local authority.

4 Immediate safeguarding route

Child concern Report immediately to Martha Bache (DSL) or Stephanie Selby (DDSL). Use the relevant children’s safeguarding route without delay where required. Notify the commissioner as appropriate.

Adult-at-risk concern Report to the DSL/DDSL. Consider the relevant Adult Social Care safeguarding route, the adult’s wishes and capacity, and commissioner involvement as appropriate.

Concern about a member of staff Report to the proprietor/DSL. Where the harm threshold may be met, seek LADO advice without conducting an internal investigation first.

Concern about Martha Bache Report to Stephanie Selby (DDSL) and the relevant LADO directly. Martha must not manage the response.

Immediate danger or urgent medical need Call 999 first. Do not wait for the DSL, parent/carer or commissioner before obtaining emergency assistance.

If the DSL is unavailable, staff contact the DDSL. If neither is immediately available, staff must not delay protective action or referral simply because they are waiting for them.

5 Roles and accountability

5 1 Proprietor

- Ensures effective safeguarding governance, resources, challenge, annual review and implementation.
- Oversees safer recruitment, checks, the Single Central Record (SCR), training and required referrals.
- Ensures online safety, filtering, device, mobile phone, image and generative-AI arrangements are proportionate to Crea Pax systems.
- Ensures allegations concerning the proprietor are managed without the proprietor controlling the response.
- Ensures learning from incidents, audits and complaints is translated into actions.

5 2 DSL and DDSL

- Are available during operating hours with clear cover arrangements.
- Manage or support referrals to children’s social care, adult safeguarding, LADO, police, Channel and other agencies as appropriate.
- Maintain accurate safeguarding records, decisions, rationale, follow-up and outcomes.
- Work with commissioners, parents/carers and professionals unless doing so could increase risk or prejudice an investigation.
- Contribute appropriately to existing statutory or multi-agency safeguarding/support plans.
- Challenge and escalate where another agency’s response may leave a learner at risk.
- Receive role training at least every two years and refresh knowledge and skills at least annually.

5 3 All staff and volunteers

All adults must know the safeguarding systems, act immediately on concerns, share information appropriately, maintain professional boundaries and never assume somebody else will act. Where unsure, they speak to the DSL/DDSL; uncertainty must not cause delay where there is immediate risk.

6 Recognising abuse, neglect, exploitation and vulnerability

Staff remain alert to abuse, neglect and exploitation inside or outside the home, within families, peer relationships or institutions, in the community and online. Concerns may overlap and may not present through a direct disclosure. A learner may experience multiple, simultaneous forms of harm.

Area	Examples / indicators
Physical abuse	Injury, poisoning, burning, suffocation, fabricated or induced illness, concerning explanations or repeated patterns.

Area	Examples / indicators
Emotional/psychological abuse	Persistent criticism, belittling, intimidation, silencing, coercive control, exposure to ill-treatment or developmentally inappropriate expectations.
Sexual abuse	Contact or non-contact abuse, hidden/intrafamilial or institutional abuse, grooming, sexual images, online facilitation, exploitation and harmful sexual behaviour.
Neglect	Persistent failure to meet physical, emotional, medical, supervision, safety or educational needs.
Exploitation and modern slavery	Criminal or sexual exploitation, county lines, trafficking, financial exploitation, organised networks, coercion and criminalisation of victims.
Domestic abuse and relationship abuse	Seeing, hearing or experiencing domestic abuse; coercive control, stalking, monitoring, isolation, threats, sexual pressure, economic control and technology-facilitated abuse, including in teenage relationships.
Prejudice-based/discriminatory harm	Racism, faith-based prejudice, sexism, misogyny, misandry, homophobia, disability-related or other discriminatory harm.
Other specific risks	FGM, forced marriage, so-called honour/faith-based abuse, radicalisation, serious violence, child-to-parent/caregiver abuse, substance misuse, young caring, homelessness/temporary accommodation and extra-familial harm.

Grooming may occur online or offline and may involve adults or peers. It can involve gifts, money, affection, attention, threats, blackmail, sexual imagery or the creation of dependency. Apparent cooperation by a child does not mean exploitation is absent.

Staff remain professionally curious where behaviour, distress, sexualised behaviour, unexplained gifts/contact, avoidance of people/places or changes in presentation raise concerns. Staff notice, record and report; they do not investigate suspected abuse themselves.

Discriminatory behaviour can itself cause harm and may also create an environment in which other abuse becomes easier to perpetrate or harder to disclose.

7 Additional barriers, SEND and care experience

Crea Pax works with learners whose SEND, communication needs, trauma, health conditions, disrupted education, previous exclusion, care experience or other circumstances may increase vulnerability or make concerns harder to recognise. Staff must not attribute injuries, distress, sexualised behaviour, absence or changes solely to disability, diagnosis or SEMH presentation.

- Use preferred and accessible communication methods and allow additional processing time.
- Recognise behaviour as a possible form of communication and consider reasonable adjustments.
- Recognise that learners may fear not being believed or may not identify their experience as harmful.
- Be alert to online grooming, bullying, exploitation and radicalisation risks.

- For looked-after children, children in kinship/special guardianship/foster arrangements and care-experienced learners, understand who holds relevant responsibilities and who should receive information.

Where Crea Pax becomes aware of a private fostering arrangement involving a child, the DSL ensures the relevant local authority is notified in accordance with current requirements.

8 Responding to a concern or disclosure

- Listen calmly and take the learner seriously.
- Do not interrogate, ask leading questions or investigate.
- Do not promise secrecy. Explain that information may need to be shared to keep people safe.
- Check immediate safety and obtain urgent medical help where needed.
- Report to the DSL/DDSL immediately, or use a direct external route if delay would create risk.
- Record factually and promptly, including the learner's own words where relevant.
- Where an injury needs recording, a body map may be used to record the observed location/presentation; staff must not conduct unnecessary examinations or ask a learner to remove clothing merely to complete a body map.

9 Decision making, referrals and early and family help

The DSL/DDSL considers the concern against current local thresholds and decides whether the response requires family/early help, statutory children's social care, adult safeguarding, police, Channel, LADO or another service. Any staff member may make a direct referral where necessary. A decision not to refer is recorded with rationale and any monitoring or review arrangements.

Crea Pax contributes appropriately to Child in Need, child protection, adult safeguarding and other multi-agency plans. Where a response from another agency appears insufficient to protect a learner, Crea Pax challenges and escalates through the relevant local procedure.

10 Child on child harm and harmful behaviour

Child-on-child abuse is never dismissed as banter, part of growing up or an inevitable feature of SEND or alternative provision. It can include bullying/cyberbullying, physical abuse, sexual violence or harassment, harmful sexual behaviour, non-consensual imagery, upskirting, hazing/initiation, coercion, threats and weapon-related harm.

The absence of reports does not mean abuse is not occurring. Where behaviour may constitute child-on-child abuse or another safeguarding concern, safeguarding procedures take precedence over ordinary behaviour-management processes.

Crea Pax considers the safety, welfare and wishes of the learner harmed and separately considers whether the learner displaying harmful behaviour may themselves have unmet safeguarding needs. Dysregulation, SEND or trauma may help explain behaviour but must not be used to minimise harm caused to another person.

Sexualised behaviour is considered in context, including age/development, SEND, frequency, coercion, power imbalance, consent, impact and possible exposure to abuse or sexual content. Staff do not investigate suspected sexual abuse themselves.

For adult learners, harmful, abusive, threatening, discriminatory or sexual behaviour is considered under adult safeguarding, criminal law and capacity/consent principles as appropriate, with particular attention to the safety of any children present.

11 Nudes, sexual imagery, sextortion, AI and deepfakes

Concerns may involve photographs, video, livestreams, digitally altered material, AI-generated content, deepfakes or “deep nudes”. Sexual extortion (“sextortion”) includes threats, blackmail, coercion or exploitation using real or fabricated sexual imagery.

Staff must not ask a learner to forward material, unnecessarily show it, search through a device/account or copy it. Staff secure the immediate situation, report to the DSL/DDSL and follow current safeguarding guidance.

12 Online safety, Wi Fi, devices and images

Crea Pax provides filtered Wi-Fi access for authorised learner use. Mobile network coverage at the premises is currently very limited; Wi-Fi enables appropriate communication and online access without unnecessary isolation. Learners aged 13+ may be permitted to connect personal devices during designated periods, subject to safe-use expectations. Technical controls do not replace supervision, professional curiosity or safeguarding action.

- Crea Pax internet access is protected by content filtering. Filtering arrangements are checked at least annually and after significant network changes.
- Crea Pax devices are securely stored and protected by access controls, including two-stage/PIN verification.
- When learners use Crea Pax devices, authorised apps are used and the device is locked into the relevant app; a staff PIN is required to exit.
- Staff use Crea Pax-controlled devices, not personal devices, to photograph or record learners.
- Personal devices brought by under-13 learners are securely stored and used only under staff supervision where necessary, including contact with parents/carers/guardians.
- Learners aged 13+ may use personal devices during designated break periods. Photographing, filming, audio-recording or livestreaming another learner is not permitted.
- Individual safeguarding/risk assessments or placement arrangements may require tighter device restrictions regardless of age.

Consent regarding photography is established at placement commencement. Where Crea Pax proposes to publish or publicly share a photograph containing an identifiable learner, specific consent is sought for that photograph before publication. General placement consent is not treated as blanket publication permission. Crea Pax does not publish learner images without prior consent.

If misuse is suspected, staff do not routinely search a learner’s personal device themselves. They secure the situation, report to the DSL/DDSL and follow the appropriate safeguarding process.

13 Attendance, missing learners, transport and handover

Crea Pax records attendance for every commissioned session, including relevant arrival/departure information and partial attendance. Reasons for absence or reduced attendance are recorded where known.

30-minute attendance procedure Where a learner does not arrive for an expected session and no explanation has been received, staff follow the communication arrangements agreed for that individual placement. The appropriate commissioning contact is notified of unexplained non-attendance within 30 minutes of the expected arrival time. Where circumstances indicate immediate safeguarding risk, staff act without delay and do not wait for the 30-minute point.

Placement arrangements may require contact with a parent/carer, commissioner, transport provider or other professional. Crea Pax does not impose one communication chain on every placement.

Repeated absence, refusal, deterioration in attendance or unexplained lateness is considered through a safeguarding and unmet-needs lens, not simply as poor attendance. Crea Pax's reporting does not replace the commissioner's statutory attendance or safeguarding responsibilities.

If a learner leaves unexpectedly or cannot be located during a Crea Pax session, staff immediately assess risk, inform the DSL/DDSL, check the immediate area without compromising others' safety, and contact parent/carer, commissioner and police as appropriate. There is no fixed waiting period where risk warrants immediate action.

Learners do not leave independently during a commissioned session unless this is an agreed part of their plan/risk assessment. For adult learners, staff respect autonomy and capacity while responding proportionately to known vulnerability and immediate risk.

Transport and collection arrangements are verified where necessary. Unfamiliar drivers/escorts or unexpected changes are checked rather than accepted solely on a learner's account. Independent travel must form part of agreed placement arrangements.

14 Behaviour, dysregulation and positive handling

Crea Pax does not use punishment as a response to dysregulation or behaviour communicating distress. Staff work with the learner to understand contributing factors, reduce risk, support regulation, repair relationships where necessary and adjust support, environment or risk management.

Staff recognise fight, flight, freeze and other dysregulated responses. Responses may include reducing demands or triggers, allowing processing time and space, offering choices, changing the activity/environment and using trusted-adult or individual regulation strategies.

Where a learner is significantly dysregulated, safety and wellbeing are the priority. Crea Pax does not routinely end a session because a learner is dysregulated; where risk can be managed safely, staff continue to support regulation and participation. Where significant risk cannot be safely managed, parent/carer and commissioner are involved as appropriate and an early end to the session may be considered as a risk-management measure, never as punishment.

Positive handling and physical intervention

Staff whose duties could involve physical intervention must have appropriate current training and work within their competence. Physical intervention is a last resort when necessary to prevent significant harm and when other strategies have been attempted or are not practicable in the immediate circumstances. It must be lawful, reasonable, proportionate and used for the minimum time. It must not be used as punishment, to enforce compliance or simply because a learner refuses an activity. Publication of this policy does not certify individual training status.

A learner walking away does not automatically justify physical intervention. Staff assess the risk, use de-escalation and follow/seek assistance as appropriate. For adult learners, staff do not use positive handling merely to prevent a capacitous adult choosing to leave; emergency intervention to prevent immediate significant harm must be lawful, necessary and proportionate.

Significant incidents and any physical intervention are recorded and reviewed. Parents/carers, commissioners and other professionals are informed as appropriate. Any injury or safeguarding concern arising from an intervention is addressed separately through the relevant procedure.

15 Off site activities, animals, environment and one to one work

Crea Pax activities may include animal-assisted interventions, outdoor learning, gardening, food growing, sports, community activities and other practical/life-skills work. Risk assessment is proportionate to the activity, learner and environment and includes dynamic assessment when circumstances change.

- Staff consider known individual risks such as absconding, impulsivity, aggression, self-harm, exploitation vulnerability, sensory/communication needs, medical needs, allergies, animal-related fears and previous incidents. SEND itself is not treated as a risk.
- Animal interaction is planned and supervised according to the learner, animal, activity and environment. Learners receive appropriate instruction and are never pressured into physical contact with an animal.
- Animal welfare is considered alongside learner safety. If an animal is stressed, unwell, fearful or unsuitable for interaction, the activity is changed or stopped. Deliberate cruelty or a concerning change in behaviour towards animals is recorded and considered in context.
- Only authorised Crea Pax animal activities form part of provision. Restricted and private areas are outside learner access; staff follow current risk controls and animal-welfare procedures.
- Learners access only areas designated or authorised for Crea Pax activities unless there is a legitimate and supervised reason otherwise.
- Supervision is sufficient to safeguard while allowing appropriate independence, privacy, therapeutic space and skill development. Staffing is determined by learner need, activity, environment, risk assessment and commissioning arrangements.
- Staff know which learners are in their care and where they are during off-site activity, using appropriate checks/headcounts when moving locations.

One-to-one working is an established and legitimate part of Crea Pax provision and is not inherently a safeguarding concern. It must have a legitimate educational/therapeutic purpose, relevant staff should generally know where the learner and staff member are, and professional boundaries apply. Unnecessarily isolated situations without legitimate purpose are avoided.

Safeguarding does not prevent appropriate private or confidential conversations. Staff use professional judgement about location and privacy while maintaining professional accountability. Absolute confidentiality cannot be promised where safeguarding information needs to be shared.

Where authorised 1:1 work takes place away from the main site, the activity/location, communication arrangements and expected return/contact arrangements are agreed. Staff may change, postpone or stop an activity if circumstances make continuation unsafe or inappropriate.

Appropriate physical contact may occur for first aid, necessary safety intervention, practical assistance or appropriate reassurance. Contact must be necessary, proportionate, respectful of dignity and consent where possible, and responsive to the individual learner’s needs. Personal/intimate care, where required, is agreed in advance wherever possible and follows an individual plan.

16 Medical needs, first aid, medication and emergencies

Relevant medical information is obtained as part of placement arrangements, including known conditions, allergies, prescribed/emergency medication, healthcare plans, emergency contacts and information staff need to support the learner safely. Changes should be communicated during the placement.

Learners normally self-administer their own medication in accordance with individual arrangements. Medication requiring secure storage is kept in designated secure medication storage while remaining appropriately accessible when required. Emergency medication arrangements prioritise timely access.

Where a learner has a medical need requiring specific staff knowledge, support or intervention, such as diabetes management or insulin, Crea Pax obtains appropriate information, training and agreed procedures before the learner begins or resumes attendance. Staff do not undertake medical procedures for which they have not received appropriate information, instruction or training.

Crea Pax maintains appropriate first-aid provision for on-site and off-site activities. Where staff believe emergency medical attention is required, they call 999 without waiting for permission. Parent/carer and commissioner are informed as soon as practicable.

Significant injuries are treated and recorded. Unexplained, inconsistent or concerning injuries are also considered as safeguarding matters. Significant medical/allergy incidents and near misses are reviewed for learning and any required changes to risk assessment, emergency information, medication access or staff awareness.

17 Mental health, self harm, suicide risk and eating concerns

Mental-health difficulties may coexist with or indicate abuse, neglect, exploitation, bullying, domestic abuse, online harm or trauma, but they do not automatically prove a safeguarding concern. Staff notice, listen, safeguard, record and escalate; they do not diagnose.

Self-harm is responded to calmly and without judgement. Staff attend to immediate physical safety/first aid, inform the DSL/DDSL and consider what further safeguarding, medical or professional action is required. Self-harm is not treated as misconduct or attention-seeking.

Suicidal thoughts are taken seriously. Where there is immediate risk to life or serious harm, staff contact emergency services. Staff are not expected to conduct clinical suicide-risk assessments; they gather enough information to understand immediate safety, involve the DSL/DDSL and escalate to appropriate professionals.

Significant changes in eating/drinking or concerns about an eating disorder receive appropriate welfare/medical response and safeguarding consideration where relevant. Equivalent emergency-safety standards apply to adult learners, while respecting adult autonomy and capacity.

18 Prevent and serious violence

Concerns about radicalisation or extremism are reported to the DSL/DDSL, who considers current local authority, police and Channel routes. Prevent concerns are handled proportionately and without stereotyping. Relevant safeguarding information follows the learner through transition where lawful and necessary.

Staff remain alert to indicators of serious violence, criminal exploitation and weapon-related risk, including changes in peer groups, unexplained injuries, gifts/money, fear, absence and coercion. Immediate danger is reported to police.

19 Adult safeguarding, consent and capacity

Safeguarding support does not stop at 18. When a learner approaches or reaches adulthood, Crea Pax considers whether existing risks and support arrangements require lawful transition into adult safeguarding, care, health or other services. The different adult statutory threshold is applied without assuming that previously identified risks have disappeared.

Adult safeguarding recognises physical, sexual, psychological/emotional, financial/material, discriminatory and organisational abuse; domestic abuse; modern slavery; neglect/acts of omission; and self-neglect. Crea Pax applies the principles of empowerment, prevention, proportionality, protection, partnership and accountability, and seeks to make safeguarding personal to the adult wherever possible.

An adult learner is presumed to have capacity unless established otherwise. Capacity is decision-specific and time-specific. SEND, SEMH needs, learning disability, mental-health difficulty, different communication or an unwise decision do not by themselves establish lack of capacity. Reasonable support is provided to help the adult understand, retain, weigh and communicate relevant information; specialist advice is sought where significant capacity issues arise.

For a capacitous adult, wishes and informed consent carry substantial weight. However, refusal of consent does not automatically prevent proportionate information sharing where another person or child may be at risk, serious crime/public-interest issues arise, coercion or intimidation is present, or capacity is in question. Decisions and rationale are recorded.

A person can have capacity and still meet adult safeguarding criteria; equally, having SEND does not automatically make someone an adult at risk.

20 Learner voice, consent, parents and carers and commissioners

Crea Pax seeks, listens to and takes seriously the learner’s wishes and feelings using methods appropriate to age, understanding, SEND and communication needs. Communication may include additional processing time, visual methods, writing/text, communication aids, familiar staff, quieter environments or discussion alongside an activity.

For children, developing autonomy is respected, but consent is not required before necessary action is taken to protect a child from safeguarding risk. Parents/carers are ordinarily involved openly and collaboratively, but are not informed before action where doing so may increase risk, prejudice an investigation or conflict with safeguarding advice. Parental disagreement does not prevent necessary safeguarding action.

Crea Pax follows recorded parental responsibility/contact arrangements and seeks clarification from the commissioner/appropriate authority where these are uncertain or disputed. Court orders or safeguarding restrictions communicated to Crea Pax are followed.

For learners aged 18 and over, the commissioner will normally remain Crea Pax’s principal professional contact in accordance with placement arrangements. Crea Pax may also work with parents, carers or supporters where this forms part of agreed arrangements and is consistent with the adult learner’s wishes, consent and capacity. Crea Pax does not assume that parental involvement gives a parent authority to make decisions for an adult learner.

For significant safeguarding decisions, records include the learner’s wishes where possible, how these were obtained and how they influenced the decision. Where action is taken contrary to those wishes, the reason is recorded.

21 Information sharing and safeguarding records

Safeguarding information is recorded promptly, factually and proportionately. Records distinguish fact, the learner’s own words, information provided by others and professional judgement. They include action taken, information shared, decisions, rationale and follow-up, forming a clear chronology.

Crea Pax provides therapeutic interventions rather than formal therapy/counselling within its commissioned provision. Information arising through therapeutic interventions forms part of the learner's Crea Pax record. Safeguarding information arising through those interventions is acted upon through this policy. Records include information relevant to provision, progress, welfare and safeguarding and avoid unnecessary personal detail.

Information is shared on a lawful, necessary and proportionate basis with people who need it for safeguarding or support. Staff do not promise absolute confidentiality. Where safe and appropriate, learners and families are told what information will be shared and why; advance notification is withheld where it could increase risk or prejudice an investigation.

Crea Pax shares relevant safeguarding information with commissioners where necessary for safeguarding, risk management or support, while recognising that not every detail held about a learner needs to be shared. Significant safeguarding information received by email, message or telephone is incorporated into the safeguarding record rather than left solely in an inbox or message thread.

Safeguarding records are securely stored with access limited according to role. When a placement ends, relevant safeguarding information is transferred securely and promptly where necessary, with a record of what was transferred, to whom, when and how. Retention/disposal follows Crea Pax data-retention arrangements and applicable requirements.

Requests from police, social care, LADO or other safeguarding authorities are handled promptly through the DSL/proprietor as appropriate. Data protection law is not used as a reason to withhold necessary safeguarding information.

Ordinary provision records and detailed safeguarding records are kept separately with access appropriate to role. Approved AI-assisted drafting may support routine records only within the assessed purpose and authorised workflow. It does not replace safeguarding reporting, professional decisions, verification or management authorisation to file. Staff do not delay protective action to draft a record.

22 Allegations, low level concerns, complaints and whistleblowing

A complaint about service quality, communication or provision follows the complaints procedure. Where a complaint contains information suggesting abuse, neglect, exploitation, unsafe staff practice or another safeguarding concern, safeguarding procedures take priority.

Concerns about adults working with learners are considered against the KCSIE harm threshold and low-level-concern framework. Where the harm threshold may be met, the DSL/proprietor seeks LADO advice and does not conduct an internal investigation before external advice where this could prejudice the process.

Low-level concerns are encouraged and recorded where behaviour is inconsistent with the staff code of conduct, including over-familiarity, favouritism, humiliating language, inappropriate social-media contact, inappropriate image use or unnecessarily secluded 1:1 working without legitimate purpose. Patterns and cumulative concerns are considered.

Where a concern is about Martha Bache, report to Stephanie Selby (DDSL) and the relevant LADO without Martha managing the response. If the designated recipient is implicated or unavailable, use the relevant external safeguarding route without delay.

Learners do not need to use formal complaint language. Statements or behaviour indicating discomfort, fear or concern about an adult are considered for safeguarding significance. Anonymous information is also considered on its specificity, reliability, context and corroboration.

Staff may raise concerns through whistleblowing arrangements and the NSPCC Whistleblowing Advice Line where internal reporting is unsafe, ineffective or implicated. No learner, family member, volunteer or staff member should be disadvantaged for raising a genuine safeguarding concern in good faith.

Where allegations are later found to be unsubstantiated, unfounded, false or malicious, Crea Pax follows appropriate guidance and considers any further safeguarding or support response required. The person raising a concern may be told that it has been received and acted upon but may not be entitled to confidential outcome details.

23 Safer recruitment, SCR, visitors, volunteers and apprentices

Safeguarding suitability is considered throughout recruitment and after appointment. Crea Pax scrutinises applications, gaps/discrepancies and suitability; verifies identity, right to work, references and relevant qualifications; obtains enhanced DBS/barred-list information where legally applicable; undertakes overseas/prohibition/restriction or other role-specific checks where required; and resolves discrepancies before appointment.

The SCR records relevant checks and is periodically audited for completeness. The removal of the supervision exemption from 1 September 2026 is considered when deciding regulated activity and barred-list eligibility; supervision is not used as a substitute for a legally required check.

Crea Pax may occasionally use volunteers. Volunteers with learner access are appropriately DBS checked and trained, with barred-list checks where applicable. They receive induction appropriate to their role and know the DSL/DDSL, reporting, boundaries, confidentiality and whistleblowing arrangements.

Apprentices, trainees and students on placement are subject to checks appropriate to their role and complete safeguarding induction before undertaking unsupervised responsibilities. Supervision reflects competence, experience, training and role.

Visitors sign in/out and are appropriately identified. Professional identity is verified where appropriate; unfamiliar unscheduled visitors may be verified with their organisation. Visitors and contractors are supervised according to purpose, duration and level of learner access, and work is organised to minimise unnecessary contact with learners.

Being personally known to Crea Pax, being a family member or “only helping” does not replace safeguarding checks. Adult learners are not used as substitutes for staff or routinely given responsibility for supervising children unless the role has been formally assessed and necessary safeguards/checks are in place.

Crea Pax makes a DBS referral where the legal duty is met and considers other professional/regulatory referrals where appropriate.

24 Training and induction

All staff receive safeguarding and child-protection training, including online safety and filtering responsibilities, at induction and receive updates as required and at least annually. Significant changes are communicated when they arise rather than waiting for the next annual session.

Induction covers, as relevant: DSL/DDSL arrangements; reporting; disclosures; allegations/low-level concerns; whistleblowing; confidentiality/information sharing; professional boundaries; online/device expectations; attendance/missing procedures; positive handling; SEND/communication; exploitation; child-on-child harm; mental health; nudes/AI; Prevent; local routes; and off-site/animal-assisted practice.

Staff whose role may require positive handling receive appropriate training. Relevant staff receive first-aid/medical training according to learner need. Volunteers and apprentices receive role-appropriate training. Training and KCSIE-reading confirmations are recorded. Understanding is checked and absent/new staff receive catch-up/induction before unsupervised work.

25 Governance, audit and review

Safeguarding is a standing management/staff consideration. The proprietor and DSL review referrals, response times, attendance patterns, allegations and low-level concerns, online-safety incidents, significant behaviour/positive-handling incidents, training, SCR evidence, risk assessments, learner/family feedback and commissioner feedback. Patterns across incidents are considered, not only individual events.

- A formal safeguarding policy review is completed at least annually and earlier following significant statutory/local change, serious incident, significant operational change or learning from practice.
- A proportionate annual safeguarding audit checks the SCR, recruitment evidence, training, KCSIE confirmations, DSL/DDSL training, Prevent, safeguarding records/chronologies, attendance reporting, referral contacts, online filtering, first aid/medical arrangements, risk assessments and linked policies.
- The DSL and DDSL review patterns, outstanding actions, training due, learner-risk changes, online concerns and significant incidents at a frequency proportionate to risk and commissioner requirements. Significant concerns are acted upon when they arise; this policy does not certify that a fixed meeting cycle is already operating.
- Actions arising from audit/review are recorded with owner, target date and completion status.
- Learner and family experience of safety is considered through reviews, observations and feedback in ways appropriate to the learner.
- Crea Pax cooperates with legitimate commissioner/LA quality-assurance activity while recognising that commissioner oversight does not transfer Crea Pax’s own safeguarding responsibility.
- The current policy is available to staff, commissioners and parents/carers on request. Superseded versions are clearly archived.
- Local safeguarding contacts carry a verification date and are checked at least annually.

26 Professional challenge and escalation

Professional disagreement and challenge are legitimate safeguarding activities. If Crea Pax believes a school, local authority, social care team, commissioner or other professional response leaves a learner at risk, the DSL challenges the decision, seeks reconsideration or senior review where required, follows the relevant local escalation/case-resolution process and records the challenge and outcome.

Safeguarding decisions are not overridden solely because a commissioner, parent/carer or other professional disagrees. Equally, Crea Pax treats professional challenge to its own decisions as an opportunity to reflect and improve.

Appendix 1 Staff immediate action card

Situation	Immediate action
Concern/disclosure	Listen • reassure • do not promise secrecy • report immediately • record factually.
Immediate danger/urgent medical need	Call 999 and notify DSL/DDSL as soon as practicable.
DSL unavailable	Contact DDSL; use direct LA/police/adult safeguarding route if delay creates risk.
Concern about staff/volunteer	Report to proprietor/DSL; consider LADO where harm threshold may be met.
Concern about proprietor/DSL	Report to Stephanie Selby (DDSL) and relevant LADO directly.
Sexual/AI imagery	Do not search, copy, forward or unnecessarily view. Secure situation and contact DSL.
Learner missing/leaves unexpectedly	Assess risk immediately; inform DSL; act without a fixed waiting period where risk is significant.
Unexplained non-attendance	Follow placement communication route; notify appropriate commissioner within 30 minutes, sooner if risk.
Response feels inadequate	Challenge/escalate through local safeguarding procedure or whistleblowing route.

Appendix 2 Minimum safeguarding record

- Learner’s name, date of birth/age and commissioner
- Date, time, location and person recording
- Concern/disclosure in the learner’s own words; observations and context
- Clear distinction between fact, information from others and professional judgement
- Immediate safety/medical action
- Who was informed and when
- Advice/referral details and reference number where applicable
- Parent/carer or adult learner involvement, or reason not involved
- Decision, rationale, responsible person and review date
- Learner’s wishes and feelings and how these influenced the decision
- Follow-up, outcome and closure/review decision
- For transfers: what was shared, with whom, when and how

Appendix 3 Sources and linked guidance

Keeping Children Safe in Education 2026 (Department for Education); Working Together to Safeguard Children 2026; Information sharing to safeguard children and young people (2026 statutory guidance, including the information-sharing duty effective 30 September 2026); Care Act 2014 and current Care and Support Statutory Guidance; Mental Capacity Act 2005 and Code of Practice; Prevent duty guidance and current Channel arrangements; UKCIS guidance on sharing nudes and semi-nudes and current online-safety guidance; DfE filtering and monitoring standards/guidance; DfE non-school alternative provision voluntary national standards; Current local safeguarding partnership procedures and thresholds for Wiltshire, Dorset and the learner’s relevant authority; Crea Pax linked policies and procedures listed in section 2.