



## SAFEGUARDING POLICY

Productive Learning UK Limited is committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.

We aim to safeguard and promote the welfare of children by protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The Designated Safeguarding Lead at Productive Learning is:

Jacqui Turley – 07548 007419 – [Jacqui.turley@productivelearninguk.co.uk](mailto:Jacqui.turley@productivelearninguk.co.uk)

The Deputy Designated Safeguarding Leads at Productive Learning are:

Nick Morris – [nick.morris@productivelearninguk.co.uk](mailto:nick.morris@productivelearninguk.co.uk)

Jim Todd – [jim.todd@productivelearninguk.co.uk](mailto:jim.todd@productivelearninguk.co.uk)

The Prevent Single Point of Contact (SPOC) at Productive Learning is: Jacqui Turley – 07548 007419 – [Jacqui.turley@productivelearninguk.co.uk](mailto:Jacqui.turley@productivelearninguk.co.uk)

Productive Learning UK Limited Child Protection (CP) Policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2002 Education Act, The Education (Independent BTEC Standards) Regulations 2014 (for independent BTECs), and the guidance contained in “Working Together to Safeguard Children”, the DfE’s statutory guidance “Keeping children safe in education”, Ofsted Guidance and procedures and Safeguarding Children Board (SCB).

We also have regard to the advice contained in DfE’s “What to do if you’re worried a child is being abused” and “Information Sharing – Advice for practitioners”. The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of Productive Learning UK Limited.

We will ensure that all staff read at least Part one of DfE guidance “Keeping children safe in education” updated July 2025 for issue in September 2025 and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one.

This policy has been devised following the [Keeping children safe in education 2025](#) standards. Please follow link for copy and please read as a part of your understanding of our policy and your legal duties.

Throughout the document there are links to information and support external to Productive Learning UK Limited



## Policy aims:

The purpose of this policy is to:

- Identify the names of responsible persons at Productive Learning UK Limited and explain the purpose of their role.
- Describe what should be done if anyone has a concern about the safety and welfare of a child who attends Productive Learning UK Limited Programmes (including Summer and Holiday Programmes).
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed “vulnerable”.
- Set out expectations in respect of training of all staff and employees and contractors.
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff, volunteers and contractors.
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non- Productive Learning UK Limited staff, e.g. volunteers, contractors etc.
- Outline how complaints against staff will be handled.
- Set out expectations regarding record keeping.
- Clarify how children will be kept safe through the everyday life of Productive Learning UK Limited service delivery.
- Outline how the implementation of this policy will be monitored.

This Policy should be read in conjunction with the following policies relevant to the safety and welfare of children:

- Anti-Bullying Policy.
- Anti-Racist Policy.
- Health and Safety Policy.
- Internet Safety Policy.
- Whistle blowing Policy.
- Code of Conduct.
- Missing from Education Policy.

*The aim of this policy is to fully comply with Keeping children safe in education (2024) Statutory guidance for schools and colleges - Updated - September 2024.*

## Responsibilities and immediate action:

Safeguarding and promoting the welfare of children at Productive Learning UK Limited is the responsibility of the whole the Productive Learning UK Limited community. All adults working at Productive Learning UK Limited (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead who is a member of Productive Learning UK Limited leadership team.



No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The DSL shares all safeguarding and Child Protection concerns with the Director of Productive Learning UK Limited, who checks and monitors all concerns raised internally or externally and that we are meeting our obligations and that external agencies are engaged and followed up on.

The DSL is also the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates Productive Learning UK Limited representation at Core Group meetings (including the submission of written reports). When an individual concern/incident is brought to the notice of the DSL, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue.

Where there is any doubt as to the seriousness of this concern, or disagreement between the DSL and the member of staff reporting the concern, advice will be sought from the Local Authority's Strategic Lead Officer for safeguarding in education services or the Early Help Service (EHS) Duty Manager.

If a child is in immediate danger or is at risk of harm, a referral will be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL will be informed, as soon as possible, that a referral has been made.

### **Early help:**

Any child may benefit from early help, but all Productive Learning UK Limited staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a family member in prison, or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.



- Is misusing alcohol and other drugs themselves.
- Has returned home to their family from care.
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child, or,
- Is persistently absent from education, including persistent absences for part of our programmes.

## **Types of child abuse and neglect:**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate



ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as

a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In the majority of cases, multiple issues will/can overlap with one another.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:

### **Child sexual exploitation (CSE):**

CSE is a type of sexual abuse in which children are sexually exploited for money, power, or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing education or not taking part in education, appearing with unexplained gifts or new possessions, associating with other young people involved in exploitation, having older boyfriends or girlfriends, suffering from sexually transmitted infections, mood swings or changes in emotional wellbeing, drug and alcohol misuse or displaying inappropriate sexualised behaviour.



A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that

person holds a position of trust or authority in relation to the young person. Nonconsensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or

drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Where it comes to our notice that a child under the age of 13 is, or may be sexually active, whether or not they are attending Productive Learning UK Limited, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the local Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

### **Domestic Abuse:**

This can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

This policy also covers staff and all other adults/professionals who could be victims of Domestic Abuse and should be reported to our DSL. This includes individual staff at Productive Learning UK Limited who are victims and can speak with other staff members or our DSL for support.

### **Female Genital Mutilation (FGM):**

FGM is a procedure where the female genital organs are injured or changed with no medical reason for it. It is a traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother and/or death. FGM is a deeply embedded social norm in some cultures, practised by families for a variety of complex reasons. The practice is not required by any religion. It is child abuse and a form of violence against women and girls and is illegal in the United Kingdom. If a learner reports to you that they have been subjected to FGM or there are plans to carry out FGM you must report this to the Police immediately and notify the DSL, or DDSL if the DSL is not available, following the report to the Police.

### **Child on child abuse:**



Staff are aware that children can abuse other children. This can include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern.
- upskirting; typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- sexting (sometimes known as youth produced sexual imagery).

Staff are clear as to Productive Learning UK Limited policy and procedures with regards to Child-on-child abuse and how to record and report and follow up.

### **Serious violence:**

All staff are made aware of indicators that may signal that children are at risk from or are involved with serious violent crime. These can include increased absences from school or educational provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harming, significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions may also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff are made aware of all associated risks and understand the measures that have been in place to manage these.

### **Mental health:**

Staff are made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, whilst following the child protection policy and speaking to the DSL.

### **Online safety:**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, staff are to ensure appropriate filters and appropriate monitoring systems are in place for all internet use while delivering our programmes.

### **County lines:**



County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into the UK, using dedicated mobile phone lines or other form of

“deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move, or store drugs, and money. Offenders will often use coercion, intimidation, violence, sexual violence, and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations

including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. We will attend any

professional multi agency meetings to obtain and to provide information when concerns are raised about county lines involvement.

### **Children who are lesbian, gay, bi, or trans (LGBTQ+):**

The fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

### **Preventing Radicalisation:**

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media.

All staff will be trained in the Prevent Duty.

Productive Learning UK Limited will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Multi Agency Safeguarding Hub (MASH).



The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this

the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

## **Referrals:**

Safeguarding referrals should be made to the child's LA Multi Agency Safeguarding Hubs (MASH) via a Common Assessment Framework (CAF) form and copied to the Local Authorities' Safeguarding Coordinator. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, honour based violence, fabricated or induced illness or the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

**MASH - Cambridgeshire - 01733 864170**

**MASH - Luton Borough Council – 01582 547653 – out of hours – 0300 300 8123**

**MASH - Central Bedfordshire Council – 0300 300 8585 – out of hours – 0300 300 8123**

**MASH - Hertfordshire - 0300 123 4043**

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness, or threats to remove the child during the day, Police intervention will be requested.

Where a child sustains a physical injury or is distressed as a result of reported chastisement or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents / Local Authorities or guardians applying for places at Productive Learning UK Limited will be informed of our safeguarding responsibilities and the existence of this policy.

In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of Productive Learning UK Limited; parents/Local Authorities/guardians will be notified of this as soon as possible.



## **Training:**

Productive Learning UK Limited will conduct Safeguarding Training (Level 3) for all staff on joining the organisation, and this will be refreshed annually.

All mentors/carers who attend Productive Learning UK Limited with a child in their care must produce a valid Safeguarding Level 3 certificate, if this is not available or not produced on the first attendance at Productive Learning UK Limited, they must attend the Productive Learning UK Limited provided training. A copy of their certificate will be retained by Productive Learning UK Limited.

All staff will be apprised of this policy and will sign to confirm it has been read and will be complied with at all times.

## **Alternative provision:**

The children in alternative provision often have complex needs, it is important that Productive Learning UK Limited staff members are aware of the additional risk of harm that attendees of the provision may be vulnerable to. Statutory guidance to which staff should have awareness of is available via:

- Alternative provision [DFE statutory guidance](#).

## **What staff should do if they have concerns about safeguarding practices within Productive Learning UK Limited:**

All staff, volunteers, and mentors/carers should feel able to raise concerns about poor or unsafe practice and potential failures in Productive Learning UK Limited's safeguarding policy and processes and know that any concerns will be taken seriously by the Director and DSL.

Where a staff member feels unable to raise any issues with the Director or DSL, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them and are detailed in the Whistleblowing Policy.

## **Safeguarding and supporting the victim:**

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible.
- Wherever possible, the victim if they wish, should be able to continue in their normal routine.



- Overall, the priority should be to make the victim's daily experience as normal as possible, so that the alternative provision is a safe space for them:
  - Consider the age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse. Alternative provisions should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged abuser(s).
  - The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
  - Consider the proportionality of the response. Support should be considered on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling will be vastly different from that of a report of rape.
- Staff should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy.
- Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).
- It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour.
- Seek advice from our DSL for information and guidance in supporting victims.

### **Recruitment:**

Productive Learning UK Limited is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed, and all staff recruited to Productive Learning UK Limited will be subject to appropriate identity, qualification and health checks. References will be verified, and appropriate criminal record checks (DBS) will be undertaken. The level of DBS check required will always be at Enhanced Check level.

Relevant members of staff who are involved in recruitment will undertake safer recruitment training.

### **Complaints/allegations made against staff:**

Productive Learning UK Limited takes seriously all complaints made against members of staff. Procedures are in place for provision attendees, parents, and staff to share any concern that they may have about the actions of any other member staff or volunteer. All such complaints will be brought immediately to the attention of the of the DSL. These procedures are used in respect of all cases in which it is alleged that a member of staff (including volunteers) at Productive Learning UK Limited has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or



- behaved towards a child or children in a way that indicates he or she would pose a risk of harm children.

The Local Authority's Designated Officer (LADO) should be informed of all allegations that come to Productive Learning UK Limited's' attention and appear to meet the reporting criteria. Contact can also be made with Local Authority's Safeguarding Coordinator who will liaise with the LADO.

Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements will be followed to resolve cases without delay.

Productive Learning UK Limited has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child and who has been removed from working (paid or unpaid)

in regulated activity, or would have been removed had they not left. Referrals will be made as soon as possible after the resignation or removal of the individual.

### **Monitoring and evaluation:**

The DSL will monitor the safeguarding arrangements for Productive Learning UK Limited to ensure that all arrangements are having a positive impact on the safety and welfare of children.

### **Additional information and support:**

What to Do if You Are Worried a Child is Being Abused - [Advice for Practitioners provides more information on understanding and identifying abuse and neglect.](#) Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff.

The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

[The online tool Report Child Abuse to Your Local Council](#) directs to relevant local authority children's social care contact number.

[Working Together to Safeguard Children.](#) Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect.
- poor record keeping.
- failing to listen to the views of the child.
- failing to re-assess concerns when situations do not improve.
- not sharing information with the right people within and between agencies



- sharing information too slowly, and,
- a lack of challenge to those who appear not to be taking action.

### **Policy Review:**

This policy will be reviewed regularly in line with legislative updates, and in any event not less than annually.

A handwritten signature in black ink, which appears to read 'J. Turley'.

**Jacqueline Turley**  
**Director – Productive Learning UK Limited**