Safeguarding Policy

Effective Date: September 2026

Review Date: April 2027

Introduction

Life Journey Academy Ltd (LJA) is committed to safeguarding and promoting the welfare of all individuals in our care. We recognise that children, young people and adults attending alternative provision (AP) may have complex needs, including social, emotional, mental health (SEMH), or special educational needs and disabilities (SEND), and may be particularly vulnerable.

This policy is LJA's single safeguarding document. It covers child protection procedures in line with KCSIE 2026 and adult protection procedures informed by the Care Act 2014, set out in dedicated sections within this document.

Safeguarding is everyone's responsibility. All staff, volunteers, and partners are expected to share this commitment and adhere to the procedures outlined in this policy.

Purpose

The purpose of this policy is to:

- Protect children, young people and adults from harm, abuse, neglect, and exploitation.
- Provide a framework for identifying, responding to, and reporting safeguarding concerns.
- Ensure compliance with UK legislation, statutory guidance, and local safeguarding arrangements.
- Promote a culture of vigilance, openness, and accountability.

Scope

This policy applies to:

- all children, young people, and adults supported by Life Journey Academy Ltd, including those placed by schools, local authorities, or other commissioning bodies, and adults accessing mentoring independently.
- all staff (permanent, temporary, or contracted), volunteers, and visitors.
- all services provided by Life Journey Academy Ltd, including 1:1 and small group mentoring, early intervention mentoring, adult mentoring, ASDAN-accredited programmes, family and parent consultations, and SEMH outreach. Delivery takes place through outreach in schools, community settings, LJA's Camberley learning space, and online where appropriate.

Legal Framework

This policy is informed by:

- *Children Act 1989 and 2004*
- *Education Act 2002*
- *Keeping Children Safe in Education (KCSIE) 2026*
- *Domestic Abuse Act 2021*
- *Working Together to Safeguard Children 2026*
- *Alternative Provision Statutory Guidance (DfE, updated 2025)*
- *The Equality Act 2010*
- *The Prevent Duty (Counter-Terrorism and Security Act 2015)*
- *Online Safety Act 2023*
- *Local Safeguarding Children Partnership (LSCP) procedures.*
- *Care Act 2014 (for safeguarding adults)*
- *Mental Capacity Act 2005*

Safeguarding Adults Principles

Our approach to safeguarding adults is informed by the Care Act 2014 and is underpinned by the six key principles of adult safeguarding:

- **Empowerment** – supporting individuals to make their own decisions and give informed consent
- **Prevention** – taking action before harm occurs
- **Proportionality** – responding in the least intrusive way appropriate to the level of risk
- **Protection** – supporting those in greatest need of safeguarding
- **Partnership** – working in partnership with local authorities and other agencies
- **Accountability** – ensuring transparency and responsibility in safeguarding practice

Definitions

Safeguarding: Protecting children, young people, and adults from maltreatment, preventing impairment of their health or development, ensuring safe and effective care, and taking action to enable all individuals to achieve the best possible outcomes.

Child and Young Person Protection: A subset of safeguarding, focusing on protecting individual children identified as suffering or likely to suffer significant harm.

Adult Protection: A subset of safeguarding that focuses on protecting individual adults who are identified as experiencing, or at risk of, significant harm due to abuse, neglect, or exploitation, particularly when they have care and support needs and are unable to protect themselves.

General Safeguarding Procedures

Identifying Concerns

Staff should be vigilant for signs of:

- Physical, emotional, or sexual abuse.
- Neglect.
- Exploitation, including child sexual exploitation (CSE), adult sexual exploitation (ASE), criminal exploitation, and county lines involvement. See the CSE Risk Policy for indicators, staff responsibilities, and referral pathways specific to exploitation.

- Radicalisation (under the Prevent Duty).
- Online safety risks (e.g., grooming, bullying).
- Child-on-child abuse (including sexual violence and harassment).
- Persistent or unexplained absence from LJA sessions is treated as a potential safeguarding indicator and triggers review in line with the Attendance Policy and, where relevant, referral to the commissioning school or local authority.
- Where exploitation indicators are present alongside potential modern slavery indicators, both a child protection referral and a modern slavery referral are completed simultaneously. See the CSE Risk Policy and Modern Slavery Policy for full referral pathways.

For adults, this includes recognising risks such as self-neglect, domestic abuse, financial or material abuse, and modern slavery, alongside other forms of abuse or neglect.

Recording

All safeguarding concerns are recorded in LJA's secure safeguarding log as soon as possible after the event.

Records include the date, time and location; what was observed, reported or disclosed; any immediate action taken; and, where relevant, subsequent actions, decisions and outcomes. The individual's own words are recorded wherever possible.

Records distinguish clearly between factual information, observations, disclosures and professional judgement. Where a safeguarding decision is made, the decision, action taken, rationale for the decision and outcome are recorded.

Safeguarding records are accurate, clear and sufficiently detailed to provide an appropriate chronology of the concern and LJA's response. Records are stored securely in line with LJA's Data Retention Policy.

Information Sharing

We will share information with commissioning schools, local authorities, and other agencies on a need-to-know basis, in line with UK GDPR and KCSIE 2026.

Where a safeguarding concern arises during a session, the commissioning school or local authority is notified by the DSL within 24 hours, unless doing so would increase the risk to the individual.

A chronology of safeguarding concerns will be maintained and shared with commissioners at the start and throughout a placement.

LJA's safeguarding practice is aligned with the procedures of the relevant Local Safeguarding Children Partnership (LSCP) for the area in which support is being delivered, including:

- Bracknell Forest LSCP: bracknellforest.gov.uk/children/safeguarding
- Surrey Safeguarding Children Partnership: surreyscp.org.uk
- Hampshire LSCP: hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren

Child Protection Procedures

This section sets out the specific procedures Life Journey Academy follows when a child protection concern arises. These procedures apply to all children and young people receiving support through LJA, regardless of funding route or setting.

Recognising a concern

A child protection concern may arise from a disclosure by the child or young person, an observation by a staff member, information received from a third party, or a pattern of indicators that, when considered together, suggests a child may be suffering or at risk of significant harm.

Staff do not need to be certain that abuse is occurring before reporting a concern. If something feels wrong, it must be reported to the DSL immediately.

Responding to a disclosure

Where a child or young person makes a disclosure:

- Listen without interrupting or showing shock
- Do not promise confidentiality
- Use open, non-leading prompts "can you tell me more about that?"
- Reassure the child that telling someone was the right thing to do
- Do not investigate or ask detailed questions
- Report to the DSL immediately after the conversation ends

Recording

All concerns and disclosures are recorded as soon as possible after the event, using the child or young person's own words wherever possible. Records include the date, time, location, what was said or observed, and any immediate action taken. Records are factual, and they do not include opinions or interpretations.

Reporting to the DSL

All concerns are reported to Lee Johnson (DSL) immediately. Where the concern involves the DSL, it is reported to Natalia Krasnianska (DDSL). Concerns are never held, investigated independently, or delayed.

Referral to children's social care

Where the DSL assesses that a child may be suffering or at risk of significant harm, a referral is made to the local authority children's social care via the Multi-Agency Safeguarding Hub (MASH) without delay. Referrals are made using the Referral Form for the relevant local authority area.

LJA operates across Berkshire, Surrey, and Hampshire. The relevant MASH is determined by where the child lives:

- **Bracknell Forest MASH**: 01344 354300,

  Referral form: https://www.bracknell-forest.gov.uk/health-and-social-care/keeping-adults-and-children-safe/protecting-children/report-child-abuse-or-concern-mash

- **Surrey MASH**: 0300 470 9100

  Referral form: https://adultsocialcareportal.surreycc.gov.uk/web/portal/pages/safereferral

- **Hampshire MASH**: 0300 555 1384

  Referral form: https://childrenandfamiliesportal.hants.gov.uk/s4s/FormDetails/FillForm?formId=279

Where there is immediate risk of harm, 999 is called first.

Notifying parents and carers

Parents or carers are informed of a referral unless doing so would place the child at greater risk or would prejudice a police investigation. The DSL takes advice from children's social care on whether and when to notify parents.

Looked-after children

Where a child protection concern involves a looked-after child, the Virtual School Head and the responsible local authority are notified in addition to the MASH referral.

Record keeping and information sharing

All child protection referrals, actions taken, outcomes, and subsequent communications are recorded in LJA's safeguarding log. Records are retained for a minimum of seven years. Information is shared with commissioning schools and local authorities within 24 hours of a concern arising, unless doing so would increase risk.

Adult Protection Procedures

This section sets out the specific procedures Life Journey Academy follows when an adult protection concern arises. These procedures apply to all adults aged 18 and above receiving support through LJA, regardless of funding route or setting.

Recognising a concern

An adult protection concern may arise through a disclosure by the adult, an observation by a staff member, information received from a third party, or a pattern of indicators suggesting an adult with care and support needs is experiencing or at risk of abuse, neglect, or exploitation.

Staff do not need to be certain that abuse is occurring before reporting a concern to the DSL.

Responding to a disclosure

Where an adult makes a disclosure:

- Listen without interrupting or showing shock
- Do not promise confidentiality
- Use open, non-leading prompts
- Reassure the adult that raising the concern was the right thing to do
- Do not investigate or ask detailed questions
- Report to the DSL immediately after the conversation ends

Capacity and consent

Adults have the right to make decisions about their own safety. Where an adult has capacity under the Mental Capacity Act 2005, their consent is sought before making a referral where possible. Capacity is decision-specific and time-specific and must not be assumed.

Where an adult lacks capacity, where there is serious risk of harm, or where a third party is at risk, a referral may be made without consent. The DSL records the capacity assessment and the rationale for any decision made without consent.

Recording

All concerns and disclosures are recorded immediately after the event, using the adult's own words wherever possible. Records are factual and do not include opinions or interpretations.

Referral to adult social care

Where the DSL assesses that an adult with care and support needs may be at risk of significant harm, a referral is made to the local authority adult social care team under Section 42 of the Care Act 2014. The relevant team is determined by where the adult lives:

- Bracknell Forest Adult Social Care: 01344 351500
- Surrey Adult Social Care: 0300 200 1005
- Hampshire Adult Social Care: 0300 555 1386

Where there is immediate risk of harm, 999 is called first.

Information sharing

Information is shared with the adult's support network, commissioning body, or other relevant professionals only where there is a lawful basis and, where the adult has capacity, with their consent. Where consent is not obtained due to serious risk of harm, this is recorded and the rationale documented.

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

- Lee Johnson is the DSL, responsible for overseeing safeguarding across the provision.

Duties include:

- Acting as the first point of contact for safeguarding concerns.
- Coordinating training for staff.
- Liaising with commissioning schools, local authorities and the LSCP (Safeguarding Children Partnership).
- Maintaining accurate safeguarding records and ensuring timely referrals to external agencies.

Deputy Designated Safeguarding Lead (DDSL)

- Natalia Krasnianska is the DDSL, supporting the DSL and acting in their absence

All Staff

- Must read and adhere to this policy, the CSE Risk Policy, the Missing Episodes and Return Home Policy, and Part 1 of KCSIE 2026.
- Must report any safeguarding concerns immediately to the DSL or DDSL.
- Must undertake annual safeguarding training and updates.
- Must be familiar with the role of the Multi-Agency Safeguarding Hub (MASH) and the referral process, including the Inter-Agency Referral Form (IARF), in the local authority area where they are delivering support.

Both Directors

Both directors are responsible for ensuring safeguarding is embedded in all aspects of LJA's operations, monitoring the effectiveness of this policy, and reviewing it annually.

Commissioners (e.g., Schools, Local Authorities)

- Retain ultimate responsibility for the safeguarding of children, young people and adults they place with us, as per *KCSIE 2026*.
- Must share relevant information (e.g., EHCPs, risk assessments) at the start of a placement and maintain ongoing communication.

Safer Recruitment

- All staff and volunteers undergo:
    - Enhanced DBS checks.
    - Identity and right-to-work verification.
    - At least two professional references.

- A Single Central Record (SCR) is maintained and regularly updated.
- Recruitment follows KCSIE 2026 safer recruitment guidelines.

Training

All staff complete:

- Annual safeguarding training (including online safety and prevention).
- Induction training on this policy and procedure.

The DSL and DDSL undertake advanced training every two years, with regular updates.

Both directors are committed to undertaking domestic abuse awareness training as part of LJA's continuing professional development plan in autumn 2026.

Working with Commissioners

We will:

- Agree on clear communication protocols with commissioning schools/local authorities.
- Provide regular progress updates and safeguarding chronologies.
- Conduct joint risk assessments where appropriate.

Commissioners must provide:

- Individual information, including EHCPs, behaviour plans, and any relevant risk assessments, prior to placement.
- Confirmation of their safeguarding oversight responsibilities.

Where a child is placed by a school, Life Journey Academy recognises that the commissioning school retains responsibility for the safeguarding of that child. LJA provides written confirmation to the commissioning school that appropriate DBS checks and safer recruitment procedures have been completed for all staff delivering sessions. LJA notifies the commissioning school immediately of any staff changes or arrangements that may affect the safety of the placement.

Specific Safeguarding Issues

Online Safety

LJA maintains a standalone Online Safety Policy which sets out arrangements for protecting children, young people, and adults from digital risks, including the use of equipment, filters, and social media. Staff monitor online activity where appropriate and address online safety as part of session planning. How children, young people, and adults can stay safe online is addressed within mentoring sessions in an age-appropriate and needs-appropriate way.

Staff are alert to misinformation, disinformation, and conspiracy theories as online content risks that can affect children and young people's welfare, attendance, and vulnerability to radicalisation.

Prevent Duty

Life Journey Academy has a duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This includes radicalisation and extremism of all forms.

Both directors have completed training in the Prevent Duty as part of the TQUK Level 2 Certificate in Safeguarding, Prevent and British Values.

Staff are alert to indicators of radicalisation, including changes in behaviour or views, expression of extremist views, withdrawal from relationships, or contact with individuals promoting extremist ideologies.

Where a radicalisation concern arises, the DSL assesses the concern and refers to the Channel programme where appropriate. Channel is a multi-agency programme that provides support to individuals identified as being vulnerable to radicalisation.

Referrals are made via the local authority Prevent team or through the national referral process. The relevant referral routes for LJA's operating areas are:

- Berkshire: via Thames Valley Police Prevent team: prevent@thamesvalley.police.uk
- Surrey Prevent: prevent@surreycc.gov.uk
- Hampshire Prevent: prevent@hants.gov.uk

All concerns, referrals, and outcomes are recorded by the DSL and shared with the commissioning school or local authority where appropriate and lawful.

Child-on-child Abuse, Sexual Violence and Harassment

LJA recognises that children and young people can abuse or harm one another. This includes physical abuse, sexual violence, sexual harassment, emotional abuse, online abuse, and harmful sexual behaviour. Child-on-child abuse is never acceptable and is never dismissed as banter or part of growing up.

Where child-on-child abuse occurs or is suspected, the DSL is notified immediately, the concern is recorded, and the referral pathway in this policy is followed. Both the child or

young person who has experienced harm and the child or young person who caused harm receive appropriate support.

Information about child-on-child abuse incidents is shared with the commissioning school or local authority promptly.

Full procedures are set out in LJA's Child-on-Child Abuse, Sexual Violence and Harassment Policy, which all staff are required to read alongside this policy.

Violence Against Women and Girls (VAWG)

LJA recognises that violence against women and girls, including sexual harassment, sexual violence, coercive control, forced marriage, and female genital mutilation (FGM), represents a specific and serious safeguarding concern. Staff are alert to indicators of VAWG in the children, young people, and adults they work with, and respond using the referral pathway set out in this policy.

Staff are alert to misogynistic and misandrist behaviour and language, including online, as forms of abuse and harassment that can cause harm and may indicate wider safeguarding risk.

For further information on the government's approach to tackling violence against women and girls, see the Tackling Violence Against Women and Girls Strategy: https://www.gov.uk/government/publications/tackling-violence-against-women-and-girls-strategy

Mental Health

We support children, young people, or adults' SEMH needs through tailored interventions and referrals to external services (e.g., CAMHS) when required.

For adults, we offer mentoring with a trauma-informed approach, and where necessary, we signpost individuals to appropriate mental health services, including local NHS providers or community-based support organisations.

Child Sexual Exploitation and Adult Sexual Exploitation

Child sexual exploitation (CSE) and adult sexual exploitation (ASE) are recognised categories of abuse that Life Journey Academy takes seriously across all age groups it supports.

LJA works with individuals who carry elevated risk factors for exploitation, including looked-after children, young people with trauma histories, post-16 young people who are not in education, employment or training (NEET), and adults with neurodivergent conditions or significant SEMH needs.

Exploitation is never the victim's fault, regardless of perceived consent. Staff must not normalise indicators of exploitation or treat them as conduct or attendance matters.

Full guidance on indicators, staff responsibilities, and referral pathways is set out in the CSE Risk Policy, which all staff are required to read alongside this policy.

Children and Adults Missing from Provision

Any situation where a child, young person, or adult cannot be located, fails to arrive for a confirmed session without prior contact, or goes missing during a supervised activity is treated as a potential safeguarding concern from the outset.

The response is risk-based. The individual's age, profile, known vulnerabilities, and history of going missing determine the pace and urgency of escalation.

For looked-after children, the Virtual School Head and responsible local authority are notified promptly. There is no minimum waiting period before police are contacted where risk is assessed as high.

Return Home Interviews are a statutory function carried out by the local authority or police. LJA does not conduct Return Home Interviews but cooperates fully with the process and contributes to any subsequent risk assessment or multi-agency review.

Full procedures for all missing episode scenarios are set out in the Missing Episodes and Return Home Policy.

Domestic Abuse

Domestic abuse, including coercive and controlling behaviour, affects children and young people both directly and indirectly. Children living in households where domestic abuse occurs are recognised as being at risk of harm under the Children Act 1989. The Domestic Abuse Act 2021 recognises children as victims in their own right where they see, hear, or experience the effects of domestic abuse.

LJA staff are alert to indicators of domestic abuse in the households of children and young people receiving support, including unexplained changes in behaviour or presentation, references to conflict or fear at home, signs of distress before or after contact with a particular adult, and direct disclosures.

Where domestic abuse is suspected or disclosed, the concern is reported to the DSL immediately and follows the referral pathway set out in this policy, including referral to the local authority MASH where the threshold is met.

For adults receiving mentoring, domestic abuse is treated as a safeguarding concern. Where capacity allows, consent is sought before referral. Where risk is serious or immediate, referral is made without consent. Signposting to specialist domestic abuse support, including the National Domestic Abuse Helpline (0808 2000 247), is offered where appropriate.

Both directors are committed to undertaking domestic abuse awareness training as part of LJA's CPD plan in autumn 2026.

Young carers

Young carers are children who provide care for a family member with a disability, illness, mental health condition, or substance misuse issue. The demands of caring responsibilities can affect a young person's attendance, engagement, and wellbeing. Staff are alert to indicators that a young person may be a young carer and respond with appropriate support and early help referral where needed.

Monitoring and Quality Assurance of Safeguarding Practice

LJA maintains internal systems to review and quality-assure safeguarding practice on an ongoing basis. These include:

- Annual review of this policy and all related safeguarding policies by the DSL and DDSL, incorporating any changes to legislation, KCSIE guidance, or LSCP procedures.
- Regular review of the safeguarding log by the DSL to identify any patterns, recurring concerns, or areas requiring action.
- Annual review of the Single Central Record to confirm all checks are current and up to date.
- Review of safeguarding training completion for all staff and contractors, with refreshers arranged where required.
- Operational discussions between both directors on safeguarding matters as part of regular planning, ensuring neither director works in isolation on safeguarding decisions.
- Where a concern or incident has been managed, a brief post-incident reflection is completed by the DSL to identify any learning and to confirm whether any change to policy or practice is needed.

Capturing the Views of Children, Young People, and Adults

LJA gathers feedback from children, young people, and adults receiving support as a routine part of delivery. This includes:

- Informal verbal check-ins within sessions, where Lee Johnson asks directly how the individual is finding the support, what is working, and whether they feel safe and comfortable.
- End-of-placement reviews, which include a structured conversation with the young person or adult and, where appropriate, their parents or carers, covering their experience of the provision and any concerns.
- Written feedback collected through end-of-placement outcome reports, which are shared with commissioners and retained on file.
- Any concern raised by a child, young person, or adult about their safety, whether about LJA, another setting, or their home, is treated as a safeguarding concern and follows the reporting pathway in this policy.
- Feedback from children, young people, and adults informs the annual policy review and any changes to practice that are needed.

Allegations Against Staff, Volunteers, and Low-Level Concerns

This section applies to any concern or allegation that a member of staff, volunteer, or contractor has:

- behaved in a way that has harmed, or may have harmed, a child, young person, or adult receiving support
- possibly committed a criminal offence against or related to a child, young person, or adult
- behaved towards a child, young person, or adult in a way that indicates they may pose a risk of harm
- behaved in a way in their personal life that raises safeguarding concerns

Low-level concerns

A low-level concern is any concern, however small, that a member of staff, volunteer, or contractor may have acted in a way that is inconsistent with LJA's values, the Conduct of Staff Policy, or professional boundaries, even if the behaviour does not meet the threshold for a formal allegation.

Low-level concerns must be reported to the DSL (Lee Johnson) immediately. Staff, volunteers and contractors are encouraged to report concerns that cause a sense of unease or uncertainty about an adult's conduct, even where they are unsure whether the behaviour meets the threshold for a formal allegation.

Where the concern involves the DSL, it is reported to the DDSL (Natalia Krasnianska).

All low-level concerns are recorded in writing, including the nature and context of the concern, the date it was raised, the decision made, the rationale for that decision and any action taken. Records are reviewed periodically to identify patterns of concerning, inappropriate or problematic behaviour.

Where a concern may meet the harm threshold for a formal allegation, LJA will follow the formal allegations procedure and seek appropriate LADO advice. Low-level concerns that do not meet this threshold do not ordinarily require LADO involvement.

Formal allegations

Where a concern meets the threshold for a formal allegation, the DSL contacts the LADO without delay. This applies even where the allegation appears minor, is historical, or the member of staff has left LJA.

The DSL does not investigate the allegation before contacting the LADO. The LADO provides advice on next steps.

The Local Authority Designated Officer (LADO)

The LADO is the officer within each local authority responsible for managing and overseeing allegations against people who work with children. The LADO is involved in all cases where it is alleged that a person who works with children has behaved in a way that meets the threshold above.

LJA operates across Berkshire, Surrey, and Hampshire. LADO contacts for each area are:

- Bracknell Forest LADO (Berkshire): lado@bracknell-forest.gov.uk, 01344 354011
- Surrey LADO: lado@surreycc.gov.uk, 0300 470 9100
- Hampshire LADO: lado@hants.gov.uk, 01962 876364

The relevant LADO is determined by the local authority area in which the individual being worked with resides, not the area in which LJA is based.

Confidentiality during an allegation

Investigations must not be compromised by premature disclosure. The DSL takes advice from the LADO on what may be shared and with whom. The subject of an allegation is informed only when the LADO advises it is appropriate to do so.

Record keeping

All records relating to allegations against staff, volunteers or contractors are retained securely in accordance with LJA's Data Retention Policy and applicable safeguarding guidance.

Confidentiality and Data Protection

- Safeguarding records are stored securely in compliance with the Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025.
- Information is shared only with those who need to know, balancing confidentiality with the need to protect the child.

Policy Review

- This policy is reviewed annually or following significant legislative/practice changes by the DSL and DDSL.
- Staff, children, young people, adults and commissioners are consulted during the review process.

Contact Details

DSL: Lee Johnson

DDSL: Natalia Krasnianska

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