Safeguarding Policy (Organisational)

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Applies To	The Lioncare Group residential children's homes and The Lioncare School

Safeguarding is everyone's responsibility. The welfare and safety of the child is the first consideration in every safeguarding decision.

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1. Procedural Guidance and Abuse Indicators

The Lioncare Group will make current, accessible safeguarding guidance available to staff on indicators of physical, emotional and sexual abuse, neglect, exploitation and significant harm, including signs that may be less visible in children with special educational needs or disabilities. Such indicators must inform professional curiosity but must never be used as a checklist that delays a referral. Staff must record and report concerns even where the evidence is incomplete.

Detailed operational forms and guidance—including referral records, allegations action logs, staff statements, safeguarding contact schedules and local Pan-Sussex procedures—will be maintained as controlled supporting documents. These do not replace the duties and reporting routes in this policy.

2. Policy Statement

The Lioncare Group is committed to safeguarding and promoting the welfare of every child cared for or educated within its residential children's homes and independent special school. We recognise every child's right to be protected from abuse, neglect, exploitation and avoidable harm, including harm that occurs within families, within care or education settings, between children, in the community and online.

Safeguarding is a shared responsibility. Every director, leader, employee, agency worker, contractor, consultant, volunteer and student working with or around children must remain professionally curious, listen to children, recognise indicators of harm and act without delay where a concern arises. No concern is too small to share where a child's safety or welfare may be affected.

The Lioncare Group adopts a child-centred and trauma-informed approach. Children will be listened to, taken seriously and supported to understand what is happening. Their wishes and feelings will be considered alongside their age,

understanding, communication needs and individual circumstances; however, the need to protect a child from harm will take precedence where necessary.

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment whether within or outside the family, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and taking action to enable children to have the best outcomes.

3. Purpose and Aims

The purpose of this policy is to provide a single safeguarding framework for The Lioncare Group that meets the requirements applicable to both residential children's homes and The Lioncare School, while recognising the distinct regulatory duties of each setting.

- Protect children from abuse, neglect, exploitation and other forms of harm.
- Ensure concerns are identified, recorded, reported and referred promptly and appropriately.
- Set out clear responsibilities and escalation routes for all adults working within or on behalf of The Lioncare Group.
- Ensure effective partnership working with placing authorities, children's social care, the Police, the Local Authority Designated Officer (LADO), Ofsted and other relevant agencies.
- Promote early identification of need and timely help before concerns escalate.
- Provide clear arrangements for allegations and low-level concerns about adults who work with children.
- Address child-on-child abuse, contextual and extra-familial harm, online risk, exploitation and other contemporary safeguarding concerns.
- Ensure safeguarding practice is monitored, audited and improved through organisational learning.

4. Scope

This policy applies across all services operated by The Lioncare Group and to all children receiving care, education or support from those services. It applies to all adults working for or on behalf of The Lioncare Group, irrespective of role, seniority, employment status or frequency of contact with children.

- Directors and senior leaders.
- Registered Managers, Home Managers, Deputy Home Managers and residential care staff.
- The Headteacher, School Operations Manager, Therapeutic Support Team Manager, teachers and school support staff.
- Administrative, domestic, maintenance and other ancillary staff.
- Agency workers, contractors, consultants and self-employed professionals.
- Volunteers and students on placement.
- Visitors where their role or activity brings them into contact with children.

For the purposes of this policy, "child" means any person under the age of 18. Where transitional safeguarding is relevant to a child approaching adulthood, planning will take account of continuing vulnerability and risk while applying the legal framework appropriate to the person's age.

5. Legal and Regulatory Framework

This policy has been prepared with regard to the legislation, regulations and statutory guidance relevant to The Lioncare Group's children's homes and independent special school. It should be applied alongside current local safeguarding arrangements and Pan-Sussex Child Protection and Safeguarding Procedures.

5.1. Core legislation and statutory guidance

- Children Act 1989 and Children Act 2004.
- Children and Social Work Act 2017.
- Care Standards Act 2000.
- Children's Homes (England) Regulations 2015, including the Protection of Children Standard (Regulation 12), Leadership and Management Standard (Regulation 13), safeguarding policies (Regulation 34) and notification of serious events (Regulation 40).
- Guide to the Children's Homes Regulations, including the Quality Standards.
- Education (Independent School Standards) Regulations 2014, particularly Part 3, paragraph 7.
- Keeping Children Safe in Education 2026 (KCSIE).
- Working Together to Safeguard Children 2026.
- Information Sharing to Safeguard Children statutory guidance 2026.
- Education Act 2002, where applicable.
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012.
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance.
- Female Genital Mutilation Act 2003, including the mandatory reporting duty for teachers.
- Domestic Abuse Act 2021.
- Sexual Offences Act 2003.
- Serious Crime Act 2015.
- Modern Slavery Act 2015.
- Equality Act 2010.
- Human Rights Act 1998.
- Data Protection Act 2018 and UK GDPR.

5.2. Local safeguarding framework

The Lioncare Group follows the Sussex Safeguarding and Child Protection Policy and Procedures Resource and Brighton & Hove safeguarding pathways. Concerns about a child in Brighton & Hove are referred to Front Door for Families; concerns about an adult who works or volunteers with children are referred or discussed with the Brighton & Hove LADO in accordance with the local allegations-management procedure.

6. Safeguarding Governance, Roles and Responsibilities

6.1. The Board of Directors and Proprietor

The Lioncare Group Board of Directors has strategic oversight of safeguarding across the Group. In relation to The Lioncare School, the Board acts as the governing body on behalf of the Proprietor. The Chief Executive Officer, who is a Company Director and Board member, has been nominated to the Chair of The Lioncare School and provide designated proprietorial oversight of safeguarding for the school. The Board must satisfy itself that safeguarding arrangements are effective, appropriately resourced and compliant with statutory requirements.

6.2. Chief Executive Officer and Responsible Individual

The Chief Executive Officer, who is also the Responsible Individual for the children's homes and Chair of The Lioncare School, has overall executive accountability for safeguarding across The Lioncare Group. This includes ensuring effective

governance, appropriate escalation of serious concerns and notifications, and that leaders are held to account for safeguarding practice.

6.3. Chief Operating Officer / Group Safeguarding Lead

The Chief Operating Officer, has been given delegated authority by the Chief Executive Officer, to take up the role and responsibility of Designated Safeguarding Lead (DSL) for The Lioncare Group, and provide group-level oversight of day-to-day safeguarding arrangements, chair the Safeguarding Monitoring Group, and supports consistency, escalation and organisational learning across the homes and school. This role does not replace the statutory responsibilities of Registered Managers or the school's Designated Safeguarding Lead.

6.4. Registered Managers

Each Registered Manager is responsible for safeguarding practice within their children's home, including implementation of this policy, staff competence, risk management, referrals, liaison with placing authorities and statutory notifications. The Registered Manager must ensure the home operates in accordance with the Protection of Children Standard and all other applicable Children's Homes Regulations. They are assisted in this task by the Home Manager and Deputy Home Manager.

6.5. The Lioncare School

The Headteacher is responsible for ensuring safeguarding arrangements are implemented effectively within the school. The School Operations Manager school has been given delegated authority by the Chief Executive Officer, to take up the role and responsibility of Designated Safeguarding Lead for The Lioncare School (DSL), with trained deputies (DDSL) being the Headteacher and the Therapeutic Support Team Manager. The DSL has the status, authority, time, training, funding and resources required to discharge the responsibilities set out in KCSIE. Deputies may act in the DSL's absence, but ultimate lead responsibility remains with the DSL.

6.6. All staff and adults working on behalf of The Lioncare Group

Every adult has a personal responsibility to safeguard children. Staff must know how to identify concerns, how to respond to a disclosure, how to record and report concerns, and how to escalate if they believe appropriate action has not been taken. Staff must never assume that somebody else will act.

If a child is in immediate danger or requires urgent medical attention, call 999 first. Internal reporting must never delay emergency action or a referral to statutory services.

7. Recognising Abuse, Neglect and Exploitation

Safeguarding concerns may arise from a single event, a pattern of behaviour, a change in presentation, information from another person, a disclosure, professional observation or information obtained through records or multi-agency working. Abuse may occur face-to-face or online and may be perpetrated by adults or children, known or unknown to the child.

7.1. Categories of abuse

Physical abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates or induces illness in a child.

Emotional abuse

Persistent emotional maltreatment that causes severe and adverse effects on a child's emotional development. It may involve conveying that a child is worthless or unloved, silencing or ridiculing a child, developmentally inappropriate expectations, serious bullying, exploitation, coercion or witnessing the ill-treatment of another.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes physical contact and non-contact activity, including grooming, sexual images, online abuse and exploitation.

Neglect

Persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development. It may include failure to provide adequate food, clothing, shelter, supervision, medical care, education, emotional responsiveness or protection from harm.

Exploitation

Children may be exploited sexually, criminally, financially or in other ways. Exploitation may involve coercion, control, deception, exchange, debt, threats, violence, grooming or manipulation and may occur online or in person.

7.2. Additional vulnerability

Children with special educational needs, disabilities, communication differences, trauma histories or mental health needs can face additional safeguarding barriers. Staff must avoid assumptions that changes in behaviour, distress, injury or communication are attributable to a child's disability or diagnosis. The possibility of abuse or neglect must always be considered.

8. Responding to Concerns, Disclosures and Allegations

8.1. Immediate response

Any concern that a child may be suffering or at risk of harm must be acted upon without delay. The adult receiving information must remain calm, listen carefully, take the child seriously and avoid asking leading or investigative questions.

- Listen and allow the child to speak in their own words.
- Do not promise secrecy or absolute confidentiality. Explain that information may need to be shared with people who can help keep them safe.
- Do not investigate, interrogate or seek to prove or disprove the account.
- Do not confront the alleged person responsible.
- Take immediate protective or medical action where required.
- Record the concern as soon as possible, using the child's own words where practicable, with date, time, context, observations and actions taken.
- Report immediately to the relevant safeguarding lead or manager.
- Escalate directly to children's social care, Police or LADO if necessary, including where the normal internal reporting route is compromised or action is not being taken.

8.2. Recording

Safeguarding records must distinguish fact, observation, professional opinion and third-party information. Records must be signed or attributable, dated, timed and maintained securely. The rationale for decisions, including decisions not to refer, must be recorded.

8.3. No investigation before referral

The Lioncare Group will not undertake an internal safeguarding investigation, where doing so could compromise a Police, children's social care or LADO process. Managers may establish sufficient basic information to make a referral and protect the child, but must seek advice before interviewing witnesses or the person subject to an allegation.

8.4. Concerns that are retracted or disputed

A retraction, inconsistency, previous history of allegations, or the presence of witnesses who offer a different account does not automatically remove safeguarding significance. Every concern will be recorded and assessed on its own facts. Where an allegation may meet the harm threshold, or there is uncertainty, the relevant manager or DSL will consult the LADO without delay. Any child-specific agreement about handling recurring concerns must be current, written, risk-assessed, agreed with the placing authority and LADO where appropriate, and must never prevent referral of a new concern that may meet threshold.

9. Referrals, Early Help and Multi-Agency Working

9.1. Early help and family help

The Lioncare Group will identify emerging needs early and work with families, placing authorities and partner agencies to secure appropriate help. For children attending The Lioncare School who are not looked after by a local authority, the school will consider Brighton & Hove's Family Help arrangements and Right Support at the Right Time framework where relevant. Consent should normally be sought for early help, unless doing so would place a child at risk or a safeguarding referral is required.

9.2. Referral to children's social care

Where a child is suffering or is likely to suffer significant harm, a referral must be made immediately to the relevant local authority children's social care service and, where appropriate, the Police. For Brighton & Hove this is Front Door for Families. A referral must not be delayed because information is incomplete or because a manager is unavailable.

9.3. Professional disagreement and escalation

If staff remain concerned after a referral, disagree with an agency decision, or believe a child is not receiving an adequate safeguarding response, the matter must be escalated through the relevant local professional-resolution process and internally to senior safeguarding leadership. Professional challenge must be respectful, evidence-based and persistent where a child remains at risk.

9.4. Working with placing authorities

For children placed in The Lioncare Group's homes, the placing authority and allocated social worker must be informed promptly of safeguarding concerns in accordance with the child's care plan and statutory requirements. The home will cooperate with strategy discussions, section 47 enquiries, child protection processes and other multi-agency arrangements.

10. Allegations and Concerns About Adults Who Work With Children

10.1. Harm threshold

An allegation or concern about an adult must be referred to or discussed with the LADO where the adult has behaved in a way that has harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way that indicates they may pose a risk of harm; or behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes relevant conduct outside work.

10.2. Reporting route

Concerns about an employee, agency worker, contractor, consultant, volunteer or other adult working with children must be reported immediately to the relevant Registered Manager or school DSL/Headteacher. If that person is implicated, the concern must be reported to Chief Operating Officer who is also DSL for The Lioncare Group. Concerns about the Headteacher must be reported to the Chair of The Lioncare School acting on behalf of the Proprietor. Concerns about the Chief Executive Officer must be reported to the Chair of the Board of Directors or the Finance Director and the LADO.

The LADO must be contacted within one working day where the harm threshold may be met. Referral must not be delayed to gather a complete evidential account. Where immediate action is required outside normal hours, the Emergency Duty Service and/or Police must be contacted, with LADO contact at the earliest opportunity.

10.3. Escalation where a senior leader is implicated

Where a concern is raised about a Registered Manager, staff must report directly to the Chief Operating Officer or Chief Executive Officer. Where the Headteacher or school safeguarding lead is implicated, staff must report to the Chair of The Lioncare School (i.e. the Chief executive Officer) acting for the Proprietor or the Chief Operating Officer. Where the Chief Operating Officer is implicated, concerns must be reported to the Chief Executive Officer or the Finance Director. Where the Chief Executive Officer (also Responsible Individual and Chair of The Lioncare School) is implicated, the matter must be reported directly to the Chair of the Board of Directors or the Finance Director and the LADO. No person who is the subject of a concern may oversee its handling.

If the relevant internal person is unavailable, implicated or does not act, the reporting person must contact the Local Authority Designated Officer (LADO), children's social care or Police directly as appropriate. Allegations concerning the Proprietor or its representative must be referred through the appropriate independent route, including the LADO. The welfare of the child and any immediate protective action must not wait for an internal management decision.

The designated unimplicated senior person must maintain a dated action log, consult the LADO within one working day where the harm threshold may be met, coordinate external notifications where required, and ensure any employment investigation does not compromise statutory enquiries.

10.4. Interim risk management and suspension

The safety of children is the first consideration. Interim measures may include increased supervision, no lone working, temporary change of duties, redeployment, instruction to refrain from work or suspension. Suspension is not automatic and will be considered only where proportionate to the identified risk, taking account of LADO/Police advice and employment law. The decision to suspend remains the responsibility of the Chief Executive Officer (or the Chair of the Board of Directors if the Chief Executive Officer is the subject of the concern being raised) The decision will be recorded with reasons and reviewed as circumstances change.

10.5. Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside work, but does not appear to meet the harm threshold. The term "low-level" does not mean insignificant.

- Over-familiarity or favouritism.
- Inappropriate or unnecessary physical contact.
- Humiliating, intimidating, sexualised or offensive language.
- One-to-one contact contrary to agreed arrangements.
- Taking or retaining images of children on personal devices.
- Using unauthorised digital or generative AI tools to process children's personal information or images.
- Any conduct that causes unease about professional boundaries.

Low-level concerns will be recorded, reviewed for patterns and managed proportionately. Where there is doubt about threshold, the LADO will be consulted. Concerns about agency staff or contractors will also be shared with their employer where appropriate.

10.6. Support for adults subject to allegations

The Lioncare Group will treat any person subject to an allegation fairly and without presuming the outcome. The Business Manager will maintain appropriate contact, explain the process and available support, and advise the person that they may seek advice from a trade union or professional association. Information about the allegation will be shared at a stage and to an extent consistent with Police, LADO and children's social care advice.

Any temporary change to duties, no-lone-working arrangement, redeployment or suspension will be documented, risk-assessed and reviewed. At the conclusion of the matter, employment decisions, support arrangements, required referrals and lessons learned will be recorded in accordance with applicable guidance and law.

10.7. Outcomes, referrals and learning

At the conclusion of an allegations process, The Lioncare Group will act on the outcome, including disciplinary action where appropriate, support for the child and adult, DBS referral where the legal duty is met, consideration of referral to the Teaching Regulation Agency where relevant, and Ofsted notification for children's homes where required. Lessons learned will be identified and shared without compromising confidentiality.

11. Child-on-Child Abuse and Harmful Sexual Behaviour

The Lioncare Group recognises that children can abuse other children and that such behaviour must never be dismissed as "banter", "part of growing up" or inevitable. Child-on-child abuse may occur within homes, school, community settings or online and may involve children of any sex.

- Bullying, including prejudice-based and cyberbullying.
- Physical abuse.
- Sexual violence and sexual harassment.
- Harmful sexual behaviour.
- Consensual and non-consensual sharing of nude or semi-nude images.
- Upskirting and other image-based abuse.
- Abuse within intimate relationships.
- Initiation or hazing-type violence and rituals.
- Coercive or controlling behaviour, exploitation and abuse facilitated by technology.

All concerns will be risk-assessed and responded to in a child-centred way. The needs and safety of the child who has experienced harm will be considered alongside the safeguarding and welfare needs of the child alleged to have caused harm. Appropriate separation, supervision, safety planning, referral and specialist support will be implemented without creating punitive or stigmatising arrangements that are not necessary for safety.

12. Specific Safeguarding Risks

Staff must maintain awareness of safeguarding risks that may require specific responses. The following list is not exhaustive and current KCSIE, Working Together and Pan-Sussex procedures must be consulted where relevant.

12.1. Contextual and extra-familial harm

Children may be harmed outside their family through peer groups, neighbourhoods, public spaces, education settings and online environments. Assessments and referrals should include the wider context in which harm occurs, not only the child's behaviour.

12.2. Child criminal exploitation, county lines and serious violence

Indicators may include unexplained money or possessions, changes in relationships, missing episodes, travel, debt, threats, injuries, carrying weapons or involvement with older individuals or groups. Children who appear to offend may themselves be victims of exploitation and require safeguarding responses.

12.3. Child sexual exploitation

Sexual exploitation is a form of sexual abuse and may involve exchange, coercion, grooming, imbalance of power and online facilitation. Apparent consent does not remove the possibility of exploitation.

12.4. Domestic abuse

Children can be victims of domestic abuse in their own right, including where they see, hear or experience its effects. The Lioncare School participates in Operation Encompass where applicable and will use information received to support and safeguard the child.

12.5. Female genital mutilation (FGM), forced marriage and honour-based abuse

Concerns must be treated as safeguarding matters and referred without delay. Teachers must comply with the statutory mandatory reporting duty where they discover that FGM appears to have been carried out on a girl under 18. Staff must not attempt family mediation, where doing so could increase risk.

12.6. Radicalisation and Prevent

Protecting children from radicalisation and being drawn into terrorism is part of safeguarding. Staff will report concerns to the DSL or manager, who will consider the appropriate safeguarding and Prevent referral pathway. Emergency or criminal concerns will be referred to the Police.

12.7. Modern slavery and trafficking

Children may be trafficked or exploited for criminal, sexual, labour or domestic purposes. Concerns will be referred to children's social care and Police and consideration given to the National Referral Mechanism by the appropriate first responder.

12.8. Mental health, self-harm and suicide risk

Mental health concerns can be an indicator or consequence of abuse, neglect or exploitation. Immediate risks of serious self-harm or suicide require urgent safety action and appropriate health or emergency referral. Safeguarding concerns must be considered alongside clinical support.

12.9. Fabricated or induced illness

Concerns that illness is being fabricated, exaggerated or induced by a caregiver must be referred to children's social care and managed in accordance with multi-agency procedures. Staff must not confront the suspected caregiver.

12.10. Private fostering

Where staff become aware of a private fostering arrangement, the relevant local authority must be notified in accordance with statutory requirements.

12.11. Transitional safeguarding

For children approaching 18, The Lioncare Group will work with children's and adult services, placing authorities and other agencies to reduce cliff-edge risks. Planning will consider continuing exploitation, abuse, disability, trauma, communication needs and vulnerability, while applying the appropriate age-related legal framework.

13. Online Safety, Filtering and Monitoring

Online safety is integral to safeguarding. Children may experience harm through content they encounter, contact with others, their own or others' conduct, and commercial or financial activity. Risks include sexual exploitation, grooming, bullying, misogyny, extremist content, misinformation, fraud, coercion, image-based abuse and misuse of generative artificial intelligence.

13.1. Organisational responsibilities

The Lioncare School will maintain appropriate filtering and monitoring systems and review their effectiveness at least annually, and sooner where risks, technology or circumstances change. The DSL will work with the IT lead and senior leadership to ensure safeguarding requirements inform system design, monitoring and response. Staff will understand their role in relation to filtering and monitoring.

Filtering and monitoring must not create unreasonable restrictions on learning or prevent children from accessing appropriate support. The school will consider age, needs, vulnerabilities, curriculum requirements and the nature of its technology estate when determining arrangements.

13.2. Mobile phones, images and personal devices

Adults must not use personal devices to take, store or share images of children for work purposes. Images required for legitimate organisational purposes must be captured, stored and used only through authorised systems and in accordance with consent, safeguarding and data-protection requirements. The school's rules on children's mobile

phones and devices will be set out in its Behaviour and Online Safety arrangements and applied proportionately to safeguarding risk.

13.3. Generative AI

Staff must not enter identifiable or sensitive information about children into unauthorised generative AI services. Any use of AI must comply with safeguarding, confidentiality, data protection and organisational information-security requirements. AI-generated or manipulated sexual images of children, including deepfakes, will be treated as a safeguarding concern and, where appropriate, referred to statutory agencies.

14. Attendance, Children Absent from Education and Missing from Care

14.1. Incidents occurring in external education settings

Where a child living in a Lioncare children's home attends another school, college or education provider, the Registered Manager will agree an effective arrangement for prompt notification of significant incidents, safeguarding concerns, exclusions and relevant changes in risk. On receipt of information, the manager will obtain an appropriate written account, consider immediate safeguarding measures and ensure relevant care plans, safeguarding risk assessments and behaviour support arrangements are reviewed.

Information will be shared promptly with residential staff and the child's social worker or placing authority where appropriate, subject to lawful confidentiality requirements. The Lioncare School will likewise share relevant incidents affecting a child with their carers, parents or placing authority, as appropriate, and coordinate protective planning.

14.2. School attendance and absence

Absence from education can be a safeguarding warning sign. The Lioncare School will monitor attendance closely, respond to unexplained or persistent absence, make timely welfare enquiries and share information with parents, carers, placing authorities and local authority services as appropriate. Attendance practice will follow current statutory guidance.

14.3. Children missing from education

Where a child's whereabouts or education status is uncertain, the school will follow local children-missing-education procedures and statutory guidance. Safeguarding concerns must be considered whenever a child is repeatedly or persistently absent, particularly where there are known risks of exploitation, abuse or neglect.

14.4. Missing from care

Children's homes will follow each home's Missing from Care Policy and local missing-person protocols. Missing episodes will be treated as potential indicators of exploitation or other harm. Risk assessments, return-home information and multi-agency intelligence will be used to identify patterns and strengthen safety planning.

14.5. Alternative provision

Where The Lioncare School arranges alternative provision, it remains responsible for safeguarding the pupil. The school will undertake due diligence, obtain written assurance of appropriate safeguarding and safer recruitment arrangements, record the location and provider details, assess risk, maintain regular contact and review the placement. Any safeguarding concern will trigger immediate review and, where necessary, termination of the placement.

15. Safer Recruitment, Staff Conduct and Whistleblowing

15.1. Safer recruitment

The Lioncare Group will operate safer recruitment arrangements consistent with KCSIE for the school and the Children's Homes Regulations for residential services. Required checks will be completed before deployment, recorded appropriately and supported by robust identity, employment history, reference, qualification, right-to-work and suitability checks. The Lioncare School will maintain a compliant Single Central Record.

DBS and barred-list checks will be undertaken according to the legal requirements applicable to the role. The level of check will not be overstated or applied where there is no lawful entitlement. Volunteers will be risk-assessed and checked in accordance with KCSIE and the legal definition of regulated activity.

15.2. Staff code of conduct and professional boundaries

All adults must maintain safe, professional and transparent boundaries. Staff must avoid favouritism, secretive relationships, inappropriate gifts, unauthorised contact, sexualised behaviour, inappropriate physical contact, misuse of social media or technology and conduct that could exploit a child's dependency or trust.

15.3. Gifts, money and professional boundaries

Staff, contractors and volunteers must not use gifts, personal money, loans, favours or private arrangements to create dependency, obtain preferential treatment or compromise professional boundaries. Personal gifts or money given to children by adults are not permitted without express managerial authorisation under the relevant service arrangements. Any authorised expenditure or gift must be transparent, proportionate, recorded and open to scrutiny.

Unexpected gifts offered by children or families must be reported to the manager and managed in accordance with the staff conduct requirements. Concerns about secrecy, coercion, exploitation or grooming must be escalated immediately as safeguarding concerns.

15.4. Off-duty conduct

Conduct outside work may raise safeguarding or suitability concerns where it indicates a risk to children or calls into question an adult's suitability to work with children. Staff must disclose relevant matters in accordance with contractual and professional requirements.

15.5. Whistleblowing

Staff who have concerns about unsafe practice, failures in safeguarding systems or the conduct of colleagues or leaders must raise them promptly through The Lioncare Group's Whistleblowing Policy. Where internal routes are inappropriate or ineffective, staff may contact the LADO, children's social care, Ofsted, the NSPCC whistleblowing advice line or another appropriate authority.

16. Information Sharing, Confidentiality and Record Keeping

Effective safeguarding depends upon timely and proportionate information sharing. Data protection law does not prevent the sharing of information for safeguarding purposes where there is a lawful basis and sharing is necessary and proportionate. Staff should not allow uncertainty about information sharing to delay action where a child may be at risk.

16.1. Restrictions on identifying teachers subject to allegations

Where an allegation against a teacher at The Lioncare School engages the statutory reporting restrictions under section 141F of the Education Act 2002, staff and leaders must not publish information likely to identify the teacher as the subject of the allegation unless and until a statutory exception applies. This does not prevent lawful and necessary disclosures to the LADO, Police, children's social care, regulators, the Proprietor or others entitled to receive safeguarding information. Any proposed public statement or external publication must be referred for appropriate legal advice.

16.2. Consent

Consent should be sought where appropriate, particularly for early help, but is not required where there is a lawful safeguarding basis to share information, where seeking consent would increase risk, or where a child may be suffering or likely to suffer significant harm.

16.3. Confidentiality

Safeguarding information will be shared on a need-to-know basis with those who require it to protect children, support enquiries or fulfil legal and regulatory responsibilities. Staff must never promise a child that safeguarding information will remain secret.

16.4. Safeguarding records

Safeguarding records will be maintained securely, separately or clearly identifiable from general records, with restricted access. Records will include concerns, referrals, advice, decisions, reasons, actions and outcomes. School safeguarding files will transfer securely when a child moves school in accordance with KCSIE. Residential records will be retained and transferred in accordance with the Children's Homes Regulations, care-planning requirements and The Lioncare Group's records-management arrangements.

17. Supporting Children and Safeguarding Practice

17.1. The child's voice

Children will be helped to understand their rights, how to raise concerns and how to access advocacy or independent support. Communication methods will be adapted to each child's needs. Staff will not interpret silence, communication difficulty, disability or a previous retraction as evidence that a child is safe.

17.2. Support following an allegation or incident

The Lioncare Group will consider the emotional, physical, educational and relational impact of safeguarding incidents on the child. Safety plans, risk assessments, key-work, therapeutic support, advocacy, healthcare and adjustments to care or education will be put in place as appropriate. Any proposed reintroduction of contact with an adult or child involved in an allegation will be planned with the child and relevant professionals and based on current risk.

17.3. Support and contact planning after an allegation

Following an allegation or safeguarding incident, the Registered Manager or Headteacher will consider the child's views, wishes, sense of safety and need for independent advocacy. Where an adult remains in post or returns to duties, contact between the adult and child will not simply resume without a proportionate risk assessment and consideration of LADO, Police and placing authority advice.

Where appropriate, an individual support and contact plan will identify the child's concerns, agreed boundaries, supervision and monitoring arrangements, the people to whom the child can speak, and arrangements for review. Relevant staff will be briefed on a need-to-know basis. The child will be offered an opportunity to discuss their experience after contact resumes and the plan will be revised if distress or new concerns emerge.

17.4. Positive relationships and therapeutic care

The Lioncare Group's therapeutic approach does not replace safeguarding procedures. Understanding trauma, attachment and behaviour must never be used to minimise a disclosure, explain away signs of harm or reduce the requirement to report concerns. Therapeutic thinking should strengthen curiosity, empathy and safe professional responses.

17.5. Physical intervention

Any restrictive physical intervention must comply with law, regulation and The Lioncare Group's Restrictive Physical Intervention and Positive Behaviour Management policies. Injuries, patterns of restraint, concerning practice or allegations arising from intervention must be considered through a safeguarding lens and reported accordingly.

18. Training, Monitoring, Audit and Quality Assurance

18.1. Induction and training

All staff will receive safeguarding and child protection training at induction and regular updates thereafter. School staff must read KCSIE Part One in full and receive updates at least annually. DSLs and deputies will receive training and updates at the frequency required by KCSIE. Residential staff will receive training appropriate to their roles and the needs of children living in the homes.

18.2. Operational training, filtering and domestic-abuse information

At induction, staff will receive service-specific guidance on recognising and reporting abuse, disclosures, record keeping, whistleblowing, professional boundaries, missing episodes, online safety and local referral arrangements. Staff at The

Lioncare School must read Part One of the current Keeping Children Safe in Education in full, and safeguarding leads must maintain training and knowledge appropriate to their responsibilities. Attendance, understanding, refreshers and any competence gaps will be recorded and monitored.

The Headteacher, designated safeguarding lead and relevant IT lead will arrange and document a review of the school's filtering and monitoring arrangements at least annually and following significant changes or incidents, with findings and remedial actions reported through governance. Arrangements must account for children's needs and reasonable access to education.

Where The Lioncare School receives information through Operation Encompass or another lawful domestic-abuse notification route, the designated safeguarding lead will consider the child's immediate welfare, share information only with staff who need it, record decisions securely and coordinate any necessary support or referral. Current local participation and contact arrangements will be maintained in the school's safeguarding contact schedule.

18.3. Safeguarding Monitoring Group

The Lioncare Group's Safeguarding Monitoring Group will review safeguarding activity, themes, incidents, referrals, allegations, low-level concerns, training, audits and organisational learning. It will provide a structured route for challenge and assurance to senior leadership and the Board of Directors.

18.4. Quality assurance

- Audit of safeguarding records and referral quality.
- Review of allegations, low-level concerns and LADO consultation.
- Review of Regulation 40 notifications and other statutory notifications.
- Monitoring of staff training and safer recruitment compliance.
- Review of attendance, missing episodes, exploitation indicators and online-safety concerns.
- Review of filtering and monitoring effectiveness within the school.
- Consideration of children's views, complaints, advocacy and feedback.
- Learning from incidents, inspections, Regulation 44 visits, Regulation 45 reviews and external safeguarding reviews.

Where weaknesses are identified, action plans will specify responsibility, timescale and evidence of completion. Repeated or systemic concerns will be escalated to the Board of Directors.

19. Policy Review and Related Policies

19.1. Review

This policy will be reviewed at least annually and sooner where there is a change in legislation, regulation, statutory guidance, local safeguarding arrangements, organisational structure, learning from a serious incident, or evidence that the policy is not operating effectively. The review will be coordinated jointly by the DSL for The Lioncare Group and the DSL for The Lioncare School and approved through The Lioncare Group's governance arrangements.

19.2. Related policies and procedures

- Employee Handbook and Staff Code of Conduct.
- Whistleblowing Policy.
- Safer Recruitment Policy and Procedure.
- Complaints Policy.
- Health & Safety Policy.
- Medication Policy.
- First Aid Policy.

- Missing from Care Policy.
- Positive Behaviour Management Policy.
- Restrictive Physical Intervention Policy.
- Online Safety / Acceptable Use arrangements.
- Data Protection and Confidentiality Policy.
- Records Management Policy.
- Educational Visits Policy.
- Equality, Diversity and Inclusion Policy.
- School Attendance Policy.
- Relationships and Sex Education Policy.

20. Key External Safeguarding Contacts

Service	Function	Contact	When to use
Emergency	Police / Ambulance	T: 999	Immediate danger, serious injury or emergency.
Brighton & Hove Front Door for Families	Children's social care / MASH	T: 01273 290400 E: FrontDoorForFamilies@brighton-hove.gov.uk	Concerns about a child; advice; family help and safeguarding referrals.
Brighton & Hove Emergency Duty Service	Out-of-hours children's services	T: 01273 335905 / 01273 335906	Urgent safeguarding concerns outside normal working hours.
Brighton & Hove LADO	Allegations management	T: 07584 217271 E: LADOenquiries@brighton-hove.gov.uk T: Out of Hours is via Front Door for Families: 01273 290400	Concerns or allegations about adults who work or volunteer with children.
Sussex Police	Non-emergency	T: 101	Police advice or reporting where there is no immediate danger.
NSPCC Whistleblowing Advice Line	Safeguarding concerns about organisational practice	T: 0800 028 0285	Independent advice for professionals who believe safeguarding concerns are not being addressed.
Childline	Support for children	T: 0800 1111	Confidential support for children.

21. Designated Safeguarding Leads – internal schedule

The current names and direct contact details of DSLs, deputies and safeguarding leads for each Lioncare setting will be maintained in a controlled internal safeguarding contact schedule and displayed or made readily accessible within each service. This avoids the policy becoming inaccurate when personnel change. The schedule must identify, at minimum, the DSL and deputy arrangements for The Lioncare School, the Registered Manager and safeguarding escalation arrangements for each children's home, the Group Safeguarding Lead, and the senior escalation route where a safeguarding leader is implicated.