



STARFISH AP
The Starfish Way
Safeguarding & Child Protection Policy
Academic Year: 2026–2027

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Designated Safeguarding Lead (DSL)	Chloe Fox – Director & Head of Provision
Deputy Designated Safeguarding Leads	All permanent members of staff (Level 2 DDSL trained)
Applies To	All employees, volunteers, agency staff, contractors,
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The Starfish Safeguarding Promise

Every child deserves adults who notice.

Adults who remain calm.

Adults who stay professionally curious.

Adults who ask one more question.

Adults who act when something doesn't feel right.

Adults who understand that safeguarding is far more than responding to disclosures.

At The Starfish Hub, safeguarding begins with relationships.

We believe children are safest when they experience consistency, belonging and trusted adults who know them well enough to notice when something changes.

We understand that behaviour is communication and that meaningful safeguarding relies upon curiosity, compassion and professional challenge as much as procedures and paperwork.

Every member of staff has a responsibility to notice.

Every member of staff has a responsibility to record.

Every member of staff has a responsibility to act.

Safeguarding is not delegated to one person.

Whilst the Designated Safeguarding Lead provides strategic leadership and oversight, safeguarding belongs to every adult working within The Starfish Hub.

Children should never have to wonder who they can speak to.

Every child should know that every adult at Starfish is a safe adult.

1. The Starfish Way and Safeguarding

At The Starfish Hub, safeguarding is not viewed as a separate function of the organisation.

It underpins everything we do.

Our relational, trauma-informed approach recognises that children cannot engage in learning until they feel emotionally, physically and psychologically safe.

The Starfish Way is built upon eight guiding principles:

- Safety – We create environments where children feel secure, protected and emotionally safe.
- Trust – We build consistent, reliable relationships that allow children to ask for help and feel confident that adults will respond.
- Attunement – We remain curious about the experiences behind behaviour and seek to understand before we judge.
- Regulation – We recognise that children must feel regulated before they can reflect, learn or repair relationships.
- Flexibility – We adapt our practice to meet individual needs rather than expecting children to fit inflexible systems.
- Inclusion – Every child deserves to experience belonging, dignity and respect regardless of background or need.
- Support – We work collaboratively with families, schools, local authorities and partner agencies because safeguarding is most effective when everyone works together.
- Humanity – We lead with empathy, compassion and hope, recognising the individuality and worth of every child.

These principles shape every conversation, every decision and every safeguarding response.

Safeguarding is therefore not something we do only when concerns arise. It is reflected in:

- the relationships we build
- the environments we create
- the language we use
- the boundaries we maintain
- the consistency we provide
- the partnerships we develop
- and the culture we nurture every day.

2. Purpose

- The purpose of this policy is to ensure that every child attending The Starfish Hub is protected from harm and that all adults understand their responsibility to safeguard and promote children's welfare.
- This policy provides a clear framework for recognising, responding to, recording and reporting safeguarding concerns, ensuring that all actions taken place the child's welfare at the centre of decision-making.

The policy aims to:

- create a culture where safeguarding is everyone's responsibility
- ensure all children feel safe, valued and listened to
- promote early identification of need through strong relationships and professional curiosity
- protect children from abuse, neglect, exploitation and harm
- provide staff with clear procedures for responding to safeguarding concerns
- ensure concerns are accurately recorded and appropriately shared using CPOMS
- work collaboratively with referring schools, families, local authorities and partner agencies
- ensure statutory safeguarding responsibilities are fulfilled continuously review and improve safeguarding practice through monitoring, training and reflection.

3. Scope

This policy applies to:

- all children attending The Starfish Hub
- all permanent employees
- sessional staff
- agency staff
- volunteers
- students on placement
- contractors
- visitors
- external professionals delivering services on behalf of Starfish.

It applies:

- within The Starfish Hub premises
- during off-site educational activities
- during outreach work
- during transport arranged by the provision
- during home visits where undertaken
- online interactions connected with the provision
- whenever concerns arise about the welfare of a child attending The Starfish Hub, regardless of where the concern originated.

Safeguarding responsibilities do not end when a child leaves the premises. Where concerns arise outside normal operating hours, staff remain responsible for acting in accordance with this policy and statutory safeguarding guidance.

4. Legislative & Statutory Framework

The Starfish Hub is committed to ensuring safeguarding practice reflects current legislation, statutory guidance and recognised best practice. This policy has been developed with reference to:

- Keeping Children Safe in Education (current edition)
- Working Together to Safeguard Children
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Online Safety Act 2023 (where applicable)
- Sexual Offences Act 2003
- Domestic Abuse Act 2021
- Alternative Provision statutory guidance
- Working Together and local safeguarding partnership procedures relevant to the local authorities in which The Starfish Hub operates and receives referrals.

This policy should be read alongside all other safeguarding-related Starfish policies, including Behaviour & Relationships, Online Safety, Attendance, Anti-Bullying, Low-Level Concerns, Staff Code of Conduct, Whistleblowing and Safer Recruitment.

5. Safeguarding Leadership & Responsibilities

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) has overall strategic responsibility for safeguarding and child protection across The Starfish Hub.

The DSL is responsible for ensuring that safeguarding remains central to every aspect of the provision and that statutory duties are fulfilled in accordance with current legislation and Department for Education guidance.

Designated Safeguarding Lead

Chloe Fox

Director & Head of Provision

Designated Safeguarding Lead (DSL)

The DSL has appropriate safeguarding training, knowledge and experience to undertake the role and maintains this through regular updates, multi-agency training, networking and continuous professional development.

The DSL is responsible for:

- leading safeguarding practice across The Starfish Hub
- promoting a strong safeguarding culture
- acting as the first point of contact for safeguarding concerns
- ensuring all safeguarding concerns are appropriately assessed and managed
- making referrals to Children's Social Care, the Police and other agencies where required
- overseeing safeguarding records held on CPOMS
- maintaining oversight of children subject to Child Protection Plans, Child in Need Plans, Early Help Assessments and other statutory interventions
- attending or contributing to multi-agency meetings
- ensuring safeguarding training remains current
- monitoring safeguarding trends and identifying emerging risks
- quality assuring safeguarding practice throughout the organisation
- ensuring policies remain compliant with current statutory guidance.

Deputy Designated Safeguarding Leads (DDSLs)

At The Starfish Hub, safeguarding leadership is intentionally distributed across the organisation.

All permanent members of staff are trained to Level 2 Deputy Designated Safeguarding Lead standard.

This reflects our belief that safeguarding should never rely upon one individual and ensures that every child has immediate access to a knowledgeable adult should concerns arise.

Deputy Designated Safeguarding Leads are expected to:

- recognise signs of abuse and neglect
- respond appropriately to disclosures
- understand statutory safeguarding thresholds
- accurately record concerns using CPOMS
- support children sensitively following disclosures
- understand referral pathways
- challenge professionally where appropriate
- contribute to safeguarding discussions and planning
- support safeguarding practice across the provision.

Whilst safeguarding leadership is shared, overall responsibility for safeguarding remains with the Designated Safeguarding Lead.

All Staff

Safeguarding is everyone's responsibility.

Every adult working within The Starfish Hub has both a legal and professional responsibility to safeguard children.

All staff are expected to:

- place the welfare of the child above all other considerations
- maintain professional curiosity
- know the signs and indicators of abuse, neglect and exploitation
- build positive, trusted relationships with children
- create environments where children feel safe to speak
- respond calmly and appropriately to disclosures
- record concerns accurately and without delay
- report concerns immediately to the DSL or DDSL
- challenge practice where necessary
- maintain professional boundaries
- complete mandatory safeguarding training
- read and understand the relevant sections of Keeping Children Safe in Education each year
- understand their individual safeguarding responsibilities regardless of role.

No member of staff should ever assume that somebody else has already acted.

The Role of Every Adult

At The Starfish Hub, we believe safeguarding begins with noticing. Every adult is expected to notice:

- changes in presentation
- changes in behaviour
- changes in attendance
- changes in friendships
- changes in emotional regulation
- changes in communication
- changes in family circumstances
- unexplained injuries
- worrying comments
- disclosures, however small they may initially appear.

Children rarely disclose abuse in a single conversation. Instead, safeguarding often depends upon adults recognising patterns over time. For this reason, no concern is considered too small to record.

6. Safeguarding Culture at The Starfish Hub

Safeguarding is not a standalone process.

It is embedded within every interaction. Children are significantly more likely to disclose concerns when they experience trusting relationships with safe, consistent adults. For this reason, safeguarding is woven throughout every aspect of life at The Starfish Hub.

Our safeguarding culture is built upon:

- consistent relationships
- emotionally safe learning environments
- trauma-informed practice
- restorative approaches
- professional curiosity
- reflective practice
- child-centred decision making
- openness and transparency
- partnership with families
- strong multi-agency working.

Safeguarding is discussed regularly within staff meetings, supervision sessions and leadership meetings to ensure it remains central to organisational practice.

Safeguarding Through Relationships

We recognise that many children attending Alternative Provision have experienced disrupted education, adverse childhood experiences, trauma or inconsistent relationships with trusted adults.

Our response is not simply procedural.

It is relational.

Every child attending The Starfish Hub is supported to develop trusted relationships with consistent adults who know them well enough to notice when something changes.

We understand that:

- behaviour is communication
- connection precedes correction
- emotional safety enables disclosure
- regulation supports reflection
- belonging protects wellbeing.

This relational approach strengthens safeguarding because children who feel emotionally safe are more likely to seek help when they need it.

Professional Curiosity

Professional curiosity is an essential safeguarding skill.

Staff are expected to remain respectfully curious whenever something does not feel right.

This means:

- asking appropriate questions
- seeking clarification
- noticing inconsistencies
- exploring patterns rather than isolated incidents
- listening carefully to children's lived experiences
- avoiding assumptions
- challenging decisions where appropriate
- sharing concerns promptly.

Professional curiosity helps ensure that opportunities to safeguard children are never missed.

The Starfish Safeguarding Standards

At The Starfish Hub, we are committed to the following safeguarding standards:

- Every child is known by name.
- Every child has a trusted adult.
- Every child is greeted and acknowledged each day.
- Every concern is listened to respectfully.
- Every safeguarding concern is recorded on CPOMS as soon as possible and, wherever practicable, on the same working day.
- Every safeguarding record is reviewed by the DSL.
- Every member of staff contributes to safeguarding.
- Every partnership is built on honesty, respect and timely communication.
- Every safeguarding decision is made in the best interests of the child.
- Every child leaves Starfish knowing they matter.

7. Early Help

At The Starfish Hub, we believe that safeguarding is most effective when concerns are recognised and responded to at the earliest possible opportunity.

Many children attending Alternative Provision have experienced disrupted education, adverse childhood experiences (ACEs), trauma, family difficulties, unmet special educational needs or social and emotional challenges. Early identification and coordinated support can prevent concerns from escalating and improve long-term outcomes.

Early Help is a collaborative approach that seeks to identify and respond to emerging needs before they become more serious or reach statutory intervention thresholds.

All members of staff have a responsibility to identify children who may benefit from Early Help and to share concerns with the Designated Safeguarding Lead (DSL) without delay.

Examples of circumstances where Early Help may be appropriate include, but are not limited to:

- poor or declining attendance
- emotional wellbeing concerns
- anxiety or low mood
- behavioural changes
- friendship difficulties
- parental conflict
- housing instability
- financial hardship
- bereavement
- emerging mental health needs
- neglect indicators
- substance misuse within the family
- caring responsibilities
- repeated low-level safeguarding concerns.

The Designated Safeguarding Lead will work alongside families, referring schools, local authorities and partner agencies to ensure children receive appropriate support at the earliest opportunity.

Where appropriate, The Starfish Hub will contribute to:

- Early Help Assessments
- Team Around the Child (TAC) meetings
- Child in Need Plans
- Child Protection Plans
- Education, Health and Care Plans (EHCPs)
- Professional meetings
- Multi-agency safeguarding arrangements.

Recognising Abuse and Neglect

Safeguarding depends upon adults recognising concerns early and responding appropriately.

All staff must remain alert to signs that a child may be experiencing abuse, neglect or exploitation.

Abuse may occur:

- within the family
- within institutions
- within peer relationships
- online
- within the wider community
- through individuals known or unknown to the child.

Children may experience one form of abuse or multiple forms simultaneously.

The four recognised categories of abuse are:

Physical Abuse

Physical abuse is the deliberate infliction of physical injury or harm.

Examples include:

- hitting
- shaking
- throwing
- poisoning
- burning
- scalding
- suffocating
- fabricated or induced illness.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child.

It may include:

- humiliation
- intimidation
- rejection
- isolation
- exposure to domestic abuse
- unrealistic expectations
- persistent criticism
- coercive control.

Children experiencing emotional abuse may struggle with:

- self-esteem
- emotional regulation
- relationships
- confidence
- learning.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities. This includes both contact and non-contact abuse.

Examples include:

- sexual touching
- rape
- sexual assault
- exposing children to pornography
- online exploitation
- grooming
- encouraging children to behave in sexually inappropriate ways
- coercing children to create or share indecent images.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs.

Examples include:

- inadequate supervision
- lack of food
- poor hygiene
- unsafe home environments
- failure to access medical care
- failure to meet emotional needs
- lack of education
- inadequate clothing.

Neglect may develop gradually over time and can have significant long-term consequences for children's development.

Additional Safeguarding Risks

Staff must also remain alert to a wide range of safeguarding issues identified within current statutory guidance.

These include, but are not limited to:

- Child-on-child abuse
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines
- Domestic Abuse
- Honour-Based Abuse
- Forced Marriage
- Female Genital Mutilation (FGM)
- Mental Health concerns
- Online abuse
- Sextortion
- Harmful Sexual Behaviour
- Sexual Violence and Sexual Harassment
- Serious Violence
- Radicalisation and Extremism
- Missing Education
- Homelessness
- Modern Slavery
- Trafficking
- Substance misuse
- Private fostering
- Youth-produced sexual imagery.

Staff receive regular safeguarding updates to ensure awareness of emerging safeguarding risks and evolving statutory guidance.

Responding to Safeguarding Concerns and Disclosure

Every concern must be taken seriously.

Children rarely disclose abuse in a straightforward way.

They may:

- tell an adult directly
- hint that something is wrong
- disclose gradually over time
- demonstrate concerning behaviour
- communicate through drawings, play or written work
- withdraw completely
- disclose to peers rather than adults.

All staff must be prepared to respond appropriately.

If a Child Makes a Disclosure

Staff should:

- remain calm
- listen carefully
- allow the child to speak freely
- accept what they are saying
- reassure the child they have done the right thing
- explain that the information must be shared with people who can help keep them safe
- record the disclosure accurately using the child's own words wherever possible
- report the concern immediately to the DSL or DDSL.

Staff Must Never

Staff must never:

- promise confidentiality
- investigate the allegation themselves
- ask leading questions
- express disbelief or shock
- interrupt unnecessarily
- make assumptions
- confront the alleged perpetrator
- delay reporting the concern
- discuss the disclosure with anyone who does not have a legitimate safeguarding need to know.

Immediate Risk of Harm

Where a child is believed to be at immediate risk of significant harm, staff must take immediate action.

This may include contacting:

- the Designated Safeguarding Lead
- emergency services
- Children's Social Care without delay.

No member of staff should delay action because they are waiting for another professional or organisation to respond.

If the Designated Safeguarding Lead is unavailable and there is immediate risk, any member of staff has the authority and responsibility to make an immediate referral to Children's Social Care or the Police.

The Designated Safeguarding Lead must then be informed as soon as reasonably practicable.

The welfare of the child is always the paramount consideration.

The Voice of the Child

The wishes, feelings and lived experiences of children remain central to safeguarding practice at The Starfish Hub.

Children will always be:

- listened to respectfully
- taken seriously
- involved appropriately in decisions affecting them
- supported to understand what will happen next
- given opportunities to express their views in ways that are appropriate to their age, stage of development and communication needs.

We recognise that some children, particularly those with SEND, speech, language and communication needs or previous traumatic experiences, may communicate concerns differently.

Staff will adapt their communication to ensure every child has the opportunity to be heard.

Recording Safeguarding Concerns & Information Sharing

Accurate Recording

Effective safeguarding depends upon accurate, timely and professional record keeping.

Every safeguarding concern, however small it may initially appear, contributes to the wider picture of a child's lived experience.

At The Starfish Hub, staff understand that a single concern may not, in isolation, meet a statutory safeguarding threshold. However, when considered alongside previous incidents or information held by partner agencies, it may become significant.

For this reason, all safeguarding concerns must be recorded.

CPOMS

The Starfish Hub uses CPOMS as its secure electronic safeguarding recording system.

CPOMS forms the central record for safeguarding, child protection and welfare concerns across the provision.

It enables the Designated Safeguarding Lead to:

- maintain oversight of all safeguarding concerns
- identify emerging patterns and cumulative risk
- monitor actions and outcomes
- ensure appropriate follow-up
- maintain secure chronological safeguarding records
- support effective information sharing with partner agencies where appropriate.

CPOMS is an essential safeguarding tool and is used consistently by all members of staff.

Recording Expectations

All safeguarding concerns must be recorded on CPOMS as soon as possible and, wherever practicable, before the end of the same working day.

Records should be:

- clear
- factual
- accurate
- objective
- respectful
- professionally written.

Wherever possible, records should include:

- the child's own words
- date and time
- location
- people present
- observations
- actions taken
- who has been informed
- professional opinion (clearly identified as opinion)
- next steps.

Staff should distinguish clearly between:

- **Fact** – what was seen or heard.
- **Observation** – professional observations.
- **Professional Opinion** – clearly identified and evidence-based.

Body Maps

Where injuries are observed, staff should record:

- location
- size
- colour
- appearance

using the CPOMS body map function where appropriate.

Staff must never photograph injuries unless specifically directed to do so by statutory agencies.

Confidentiality

Safeguarding records are highly confidential.

Access to CPOMS is restricted according to safeguarding responsibilities.

Information is shared strictly on a need-to-know basis and always in accordance with:

- UK GDPR
- Data Protection Act 2018
- Information Sharing guidance
- Keeping Children Safe in Education.

Children's safety will always take precedence over data protection concerns where information sharing is necessary to protect them from harm.

Professional Recording Standards

Safeguarding records should never include:

- assumptions
- speculation presented as fact
- judgemental language
- personal opinions without evidence
- unnecessary information.

Instead, staff should ask themselves:

"If this record were read in court tomorrow, would it accurately describe what happened?"

Professional recording protects children.
It also protects staff.

Information Sharing

Effective safeguarding relies upon timely, accurate and proportionate information sharing. The Starfish Hub is committed to working openly and collaboratively with children, families and professionals wherever it is safe and appropriate to do so.

Information will be shared:

- lawfully
- proportionately
- securely
- promptly
- in the child's best interests.

Staff understand that they must never allow concerns about data protection to delay sharing information where a child may be at risk of harm.

Partnership with Home Schools

As an Alternative Provision, The Starfish Hub works in partnership with commissioning schools to safeguard children effectively.

We recognise that children attending The Starfish Hub will usually remain on roll at their home school.

Safeguarding is therefore a shared responsibility.

Wherever possible, we work collaboratively with the referring school's Designated Safeguarding Lead to ensure children experience consistent, coordinated safeguarding support.

This includes contributing to:

- Early Help Assessments
- Child in Need Plans
- Child Protection Plans
- Team Around the Child meetings
- Education, Health and Care Plan reviews
- Professional meetings
- Reintegration planning
- Risk assessments.

Information is shared promptly to ensure safeguarding decisions are informed by the fullest possible understanding of the child's circumstances.

Acting in the Child's Best Interests

Whilst partnership working remains central to our practice, safeguarding action must never be delayed because another organisation is involved.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead acting in their absence) will make an immediate referral to Children's Social Care, the Police or any other appropriate safeguarding agency, in accordance with statutory guidance.

Wherever it is safe and appropriate to do so, the referring school's Designated Safeguarding Lead will be informed of the action taken at the earliest opportunity to ensure a coordinated safeguarding response.

However, information will not be shared where doing so would:

- place the child or another person at increased risk of harm
- compromise a criminal investigation
- prejudice statutory safeguarding enquiries
- conflict with advice provided by Children's Social Care or the Police.

Our overriding responsibility is, and will always remain, the safety and welfare of the child.

Multi-Agency Working

Safeguarding is most effective when professionals work together. The Starfish Hub is committed to positive and proactive multi-agency working.

We work closely with:

- referring schools
- local authorities
- Children's Social Care
- Early Help services
- Police
- CAMHS
- School Nursing Services
- Virtual School Heads
- SEND teams
- Educational Psychologists

- Youth Justice Services
- Health professionals
- Family support services
- commissioned therapists and other relevant agencies.

Staff contribute openly and professionally to meetings, reports and safeguarding discussions, ensuring the child's voice remains central throughout.

Escalation and Professional Challenge

Effective safeguarding depends upon respectful professional challenge.

Where staff believe that:

- concerns have not been taken seriously
- thresholds have been incorrectly applied
- actions are insufficient to protect a child
- they are expected to raise this with the Designated Safeguarding Lead.

Where necessary, The Starfish Hub will escalate concerns through the appropriate safeguarding partnership procedures.

Professional disagreement should never prevent action being taken in the best interests of a child.

The Starfish Principle

Safeguarding is built one conversation at a time.

One observation.

One professional curiosity.

One accurate record.

One timely conversation with a colleague.

One referral made without hesitation.

One child knowing that an adult noticed.

Child-on-Child Abuse

The Starfish Hub recognises that children can abuse other children.

Child-on-child abuse is never dismissed as:

- "banter"
- "falling out"

- "part of growing up"
- "just what teenagers do"

or any other explanation that minimises the seriousness of the behaviour.

All allegations and concerns will be taken seriously, investigated appropriately and responded to in accordance with this policy.

The safety and welfare of all children involved will remain paramount.

Child-on-child abuse may occur both inside and outside of the provision and may also occur online.

Examples include, but are not limited to:

- physical abuse
- bullying (including cyberbullying)
- prejudice-based bullying
- sexual violence
- sexual harassment
- harmful sexual behaviour
- image-based abuse
- coercive or controlling behaviour
- initiation or hazing rituals
- upskirting
- sharing sexual images without consent
- abuse within intimate personal relationships.

The Starfish Hub recognises that children displaying harmful behaviour often require safeguarding support themselves.

Our response will therefore safeguard everyone involved whilst ensuring accountability remains clear.

Incidents involving child-on-child abuse will always be:

- recorded on CPOMS
- reviewed by the DSL
- risk assessed
- shared appropriately with commissioning schools
- referred to Children's Social Care or Police where required.

Child-on-child abuse will never be managed solely as a behaviour issue.

Online Safety

Technology is an important part of children's lives and educational experiences.

The Starfish Hub aims to support children to use technology safely, responsibly and respectfully whilst recognising the significant safeguarding risks associated with digital communication.

Online safeguarding forms part of everyday practice and is embedded throughout our curriculum and pastoral support.

Children are supported to understand:

- healthy online relationships
- digital footprints
- consent
- privacy
- online exploitation
- misinformation
- appropriate online behaviour
- respectful communication
- reporting concerns.

Staff understand that safeguarding concerns may arise through:

- social media
- messaging applications
- gaming platforms
- livestreaming
- online forums
- artificial intelligence (AI)
- image-sharing platforms.

Emerging technologies create new safeguarding risks.

Staff receive regular safeguarding updates to ensure they remain aware of evolving online harms.

Artificial Intelligence (AI)

The Starfish Hub recognises the increasing use of Artificial Intelligence (AI) by children and young people.

Whilst AI offers educational opportunities, it may also present safeguarding risks. 25

Examples include:

- AI-generated indecent images
- manipulated photographs
- impersonation
- fake conversations
- online grooming
- cyberbullying
- misinformation
- exploitation.

Any misuse of AI which places a child at risk will be managed as a safeguarding concern.

Attendance, Missing Education and Safeguarding

At The Starfish Hub we recognise that attendance is a safeguarding issue.

Children who do not attend regularly are at greater risk of:

- abuse
- neglect
- exploitation
- criminal exploitation
- sexual exploitation
- radicalisation
- missing education.

Attendance is monitored daily.

Patterns of absence are reviewed alongside safeguarding information to identify emerging concerns.

As an Alternative Provision, attendance information is shared promptly with commissioning schools in accordance with agreed partnership arrangements.

Where attendance gives rise to safeguarding concerns, the DSL will:

- review the child's safeguarding history
- liaise with the commissioning school
- contact parents or carers where appropriate
- consider Early Help
- consider referral to Children's Social Care where thresholds are met.

Children Missing Education (CME)

The Starfish Hub recognises that children missing education are at increased risk of significant harm.

Where a child fails to attend unexpectedly, staff will follow agreed attendance procedures immediately.

Where safeguarding concerns exist, the DSL will ensure that appropriate agencies are informed without delay.

Mental Health and Emotional Wellbeing

The Starfish Hub recognises that mental health difficulties are not safeguarding concerns in themselves.

However, poor mental health may:

- increase vulnerability
- be an indicator of abuse or neglect
- increase safeguarding risk
- affect children's ability to keep themselves safe.

Staff remain alert to changes in:

- mood
- behaviour
- emotional presentation
- relationships
- attendance
- engagement.

Children presenting with concerns relating to:

- self-harm
- suicidal ideation
- eating disorders
- significant anxiety
- trauma responses

will receive appropriate safeguarding assessment by the DSL.

Support may include:

- immediate safeguarding planning
- referral to external agencies
- communication with families
- liaison with CAMHS
- liaison with commissioning schools
- ongoing pastoral support.

Contextual Safeguarding

The Starfish Hub recognises that safeguarding risks often extend beyond the family home.

Children may experience harm within:

- peer groups
- neighbourhoods
- public spaces
- transport
- online environments
- community settings.

Safeguarding assessments therefore consider the wider contexts in which children live.

This includes understanding:

- friendship groups
- online activity
- exploitation risks
- community influences
- places where children spend time.

Where contextual safeguarding concerns are identified, The Starfish Hub will work collaboratively with partner agencies to reduce risk and promote safety.

Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and County Lines

Staff understand that exploitation often occurs through grooming, manipulation and coercion. Children may not recognise themselves as victims.

Warning signs may include:

- missing episodes
- unexplained money
- expensive items
- new friendships
- secrecy
- unexplained injuries
- changes in behaviour
- carrying weapons
- substance misuse
- increased absence.

The Designated Safeguarding Lead will consider immediate referral to Children's Social Care and Police where exploitation is suspected.

Preventing Radicalisation and Extremism

The Starfish Hub recognises its duties under the Prevent Duty.

Staff receive Prevent training appropriate to their role.

Children may become vulnerable to extremist ideologies through:

- isolation
- online influence
- social vulnerabilities
- exploitation.

Staff are expected to report concerns immediately to the DSL.

Where appropriate, referrals will be made to Prevent or Channel in accordance with local safeguarding procedures.

The Starfish Hub promotes:

- critical thinking
- respectful debate
- tolerance
- democracy
- individual liberty
- mutual respect
- the rule of law.

These fundamental British values form part of our wider safeguarding culture.

The Starfish Reflection

At The Starfish Hub, safeguarding is not simply about recognising risk.

It is about recognising children.

Children who feel seen.

Children who feel heard.

Children who know that adults notice when something changes.

Because safeguarding begins long before a referral is made.

It begins with relationships.

Low-Level Concerns About Adults

The Starfish Hub is committed to creating a culture of openness, transparency and continuous professional reflection.

Recognising and responding to low-level concerns is an important part of safeguarding children and maintaining a culture of vigilance.

A low-level concern is any concern, no matter how small, that an adult working with children may have:

- acted inconsistently with the Staff Code of Conduct
- behaved in a way that has caused a sense of unease or concern
- demonstrated poor professional judgement
- failed to maintain appropriate professional boundaries
- behaved in a manner that does not meet the expected standards of The Starfish Hub.

Low-level concerns may not meet the threshold for referral to the Local Authority Designated Officer (LADO), but they remain important.

Examples may include:

- using inappropriate language
- favouritism
- unnecessary one-to-one situations without justification
- inappropriate communication outside agreed channels
- sharing excessive personal information
- failing to follow safeguarding procedures
- creating avoidable safeguarding vulnerabilities.

All low-level concerns should be shared with the Designated Safeguarding Lead (or an appropriate senior leader where the concern relates to the DSL).

Concerns will be:

- recorded appropriately
- reviewed objectively
- considered alongside previous concerns
- managed proportionately
- retained in accordance with current statutory guidance.

Creating a culture where staff feel able to raise concerns protects both children and professionals.

Allegations Against Adults

The Starfish Hub takes all allegations involving adults working with children extremely seriously.

This includes:

- employees
- volunteers
- contractors
- agency staff
- visitors
- professionals working on behalf of Starfish.

An allegation may indicate that an adult has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against a child
- behaved towards a child in a way that indicates they may pose a risk to children
- behaved in a way that may not relate directly to a child but raises concerns about their suitability to work with children.

Any allegation meeting these thresholds will be referred without delay to the Local Authority Designated Officer (LADO) and managed in accordance with statutory guidance.

Where the allegation concerns the Designated Safeguarding Lead, the concern must be reported directly to the appropriate senior governance lead and the LADO, without informing the DSL beforehand if doing so could compromise the process. The welfare of the child will always remain the paramount consideration.

Safer Recruitment

The Starfish Hub is committed to ensuring that unsuitable individuals are prevented from working with children.

Safer recruitment procedures are followed for all appointments and reflect current statutory guidance.

Recruitment processes include:

- enhanced DBS checks (including barred list where appropriate)
- identity verification
- right to work checks
- qualification verification
- employment history checks
- professional references
- prohibition checks where applicable
- overseas checks where required
- online searches as part of pre-employment due diligence, in line with current statutory guidance.

At least one member of every recruitment panel will have completed accredited Safer Recruitment training.

A Single Central Record (SCR) is maintained and regularly audited.

Visitors, Contractors and Volunteers

The Starfish Hub is committed to ensuring that all visitors contribute to a safe environment for children.

All visitors must:

- report to reception on arrival
- sign in and out
- wear an appropriate visitor badge
- be accompanied where required
- receive safeguarding information on arrival
- understand how to report safeguarding concerns.

Visitors must never be left unsupervised with children unless appropriate safeguarding checks have been completed and verified.

Contractors and external professionals are expected to follow The Starfish Hub's safeguarding procedures whilst on site.

Whistleblowing

Every member of staff has a professional responsibility to raise concerns about unsafe practice.

Concerns may relate to:

- safeguarding practice
- professional conduct
- organisational culture
- leadership
- unsafe systems
- failures to protect children.

Staff are encouraged to raise concerns promptly without fear of reprisal.

Where concerns cannot be resolved internally, staff may contact external agencies including:

- the Local Authority
- the LADO
- the NSPCC Whistleblowing Advice Line
- Ofsted (where appropriate)
- the Police.

Whistleblowing is viewed as an important safeguarding responsibility and contributes to a culture of openness and accountability.

Safeguarding Training

Safeguarding training is central to maintaining a safe culture at The Starfish Hub. All staff receive safeguarding training appropriate to their role before working unsupervised with children.

Training includes:

- safeguarding and child protection
- Keeping Children Safe in Education
- Prevent Duty
- online safety
- child-on-child abuse
- trauma-informed practice

- recognising abuse
- responding to disclosures
- CPOMS recording
- information sharing
- professional curiosity
- low-level concerns
- whistleblowing.

Training is refreshed regularly and whenever there are significant changes to legislation or statutory guidance.

Safeguarding Leadership Training

- Chloe Fox, Director & Head of Provision, is the Designated Safeguarding Lead (DSL).
- All permanent members of staff are trained as Level 2 Deputy Designated Safeguarding Leads, ensuring safeguarding knowledge is embedded across the organisation and that children always have access to trained safeguarding professionals.

Safeguarding updates form a standing agenda item within staff meetings, and learning from safeguarding practice is shared regularly to support continuous improvement.

Monitoring, Quality Assurance and Governance

Safeguarding arrangements are subject to ongoing monitoring to ensure they remain effective.

This includes:

- regular review of CPOMS records
- safeguarding audits
- attendance monitoring
- behaviour and safeguarding trend analysis
- policy review
- staff supervision
- safeguarding discussions during team meetings
- review of training records
- quality assurance of safeguarding documentation
- feedback from children, families and partner agencies where appropriate.

The Designated Safeguarding Lead will regularly review safeguarding practice to identify:

- emerging risks
- recurring themes
- opportunities for improvement
- additional training needs
- lessons learned from safeguarding practice.

This policy will be reviewed annually or sooner if:

- legislation changes
- statutory guidance is updated
- local safeguarding arrangements change
- significant safeguarding incidents identify a need for review.

The Starfish Safeguarding Directory

Emergency

Emergency Services

 999

If a child is in immediate danger or at risk of significant harm, contact the emergency services immediately.

Police (Non-Emergency)

Hampshire & Isle of Wight Constabulary

 101

Children's Social Care

Hampshire County Council – Multi-Agency Safeguarding Hub (MASH)

For safeguarding concerns relating to children living within Hampshire.

Southampton City Council – Children's Resource Service (CRS)

For safeguarding concerns relating to children living within Southampton.

Emergency Duty Team

For safeguarding concerns arising outside normal office hours, contact the relevant Local Authority Emergency Duty Team.

National Support

NSPCC

 0808 800 5000

Advice and support for professionals, families and children.

Childline

 0800 1111

Confidential support for children and young people.

Local Support Services

Yellow Door

Providing specialist support for children, young people and adults affected by domestic abuse, sexual violence and abuse.

No Limits

Independent support for children and young people across Southampton, Hampshire and the Isle of Wight, including emotional wellbeing, counselling, advocacy and practical support.

Additional Services

Where appropriate, families may also be signposted to:

- CAMHS
- School Nursing Service
- Early Help
- Family Support Services
- GP
- Educational Psychology
- SEND Services
- Youth Justice Service
- Domestic Abuse Services
- Substance Misuse Services

The Starfish Commitment

At The Starfish Hub, safeguarding is not simply a policy.

It is our culture.

It is the conversations we have.

The relationships we build.

The professional curiosity we demonstrate.

The records we keep.

The partnerships we nurture.

The courage to act when something does not feel right.

Every child deserves adults who notice.

Every child deserves adults who listen.

Every child deserves adults who act.

We are committed to creating an environment where children feel safe enough to speak, trusted enough to ask for help, and supported enough to thrive.
Safeguarding is everyone's responsibility.

And at The Starfish Hub, it always comes first.

Appendix A

The Starfish Hub

Safeguarding Procedure at a Glance

Every Adult. Every Concern. Every Time.

STEP 1 – NOTICE

You see, hear or become aware of something that concerns you.

This may include:

- A disclosure by a child
- A change in behaviour or presentation
- An unexplained injury
- Poor attendance
- Concerning online activity
- Information shared by another professional
- A concern raised by a parent or carer
- A safeguarding concern involving another member of staff
- Any situation where a child may be at risk of harm

Never ignore a concern because it seems small.



STEP 2 – MAKE THE CHILD SAFE

Where appropriate:

- Stay calm.
- Listen carefully.
- Reassure the child.
- Do not promise confidentiality.
- Explain that you will need to share the information with people who can help keep them safe.
- Do not investigate.
- Do not ask leading questions.
- Never confront the alleged perpetrator.

If the child is in immediate danger, call 999.



STEP 3 – RECORD ON CPOMS

Record the concern as soon as possible and, wherever practicable, before the end of the working day.

Your CPOMS record should include:

- ✓ Date and time
- ✓ Child's own words
- ✓ Observations
- ✓ Facts only
- ✓ Actions taken
- ✓ People informed
- ✓ Next steps (if known)

Remember:

If it isn't recorded, it didn't happen.



STEP 4 – INFORM THE DSL / DDSL

Notify:

Chloe Fox

Director & Head of Provision

Designated Safeguarding Lead

or

A trained Deputy Designated Safeguarding Lead.

At The Starfish Hub all permanent staff are trained as Level 2 Deputy Designated Safeguarding Leads, ensuring safeguarding support is always available.



STEP 5 – DSL RISK ASSESSMENT

The DSL will:

- ✓ Review the CPOMS chronology
- ✓ Speak with staff where required
- ✓ Consider previous concerns

- ✓ Consider contextual safeguarding risks
- ✓ Assess immediate risk
- ✓ Decide appropriate action

Possible outcomes include:

- Monitor
- Early Help
- Support within Starfish
- Contact parents/carers
- Liaise with commissioning school
- Refer to Children's Social Care
- Refer to Police
- Multi-agency meeting
- Safety Plan
- Risk Assessment



STEP 6 – WORKING WITH HOME SCHOOLS

As an Alternative Provision, safeguarding is a shared responsibility. Wherever possible, The Starfish Hub will work collaboratively with the commissioning school's Designated Safeguarding Lead.

This includes:

- sharing concerns promptly
- contributing to safeguarding plans
- attending professional meetings
- supporting Early Help
- supporting Child Protection processes
- contributing to reintegration planning.

However...

Safeguarding action must never be delayed because another organisation is involved.

Where a child is at risk of significant harm, The Starfish Hub will make an immediate referral to Children's Social Care or the Police where appropriate and inform the commissioning school at the earliest safe opportunity, unless doing so would increase risk or compromise safeguarding procedures.



STEP 7 – ONGOING SUPPORT

Safeguarding does not end after a referral.
Children may require:

- Daily check-ins
- Trusted adult support
- Emotional regulation
- Safety planning
- Multi-agency support
- Attendance monitoring
- Behaviour support
- Reintegration planning
- Mental health support

The child's voice remains central throughout.



STEP 8 – REVIEW

The DSL will ensure:

- ✓ Actions completed
- ✓ Agencies updated
- ✓ CPOMS chronology maintained
- ✓ Risk reviewed
- ✓ Child's voice recorded
- ✓ Parents updated where appropriate
- ✓ Home school informed where appropriate
- ✓ Ongoing support remains in place

Safeguarding concerns are only closed when it is safe and appropriate to do so.

The Starfish Safeguarding Principles

Every concern matters.

Every child deserves to be heard.

Every concern is recorded.

Every concern is shared appropriately.

Every concern receives professional consideration.

Every child has a trusted adult.

Every safeguarding decision begins with one question:

"What is in the best interests of this child?"

Service	Contact
Emergency Services	999
Southampton LADO	023 8091 5535
Hampshire LADO	<u>LADO@hants.gov.uk.</u>
Police (Non-Emergency)	101
Hampshire MASH	<i>0300 555 1384</i>
Southampton Children's Resource Service	<i>02380 832 300</i>
Emergency Duty Team	<i>Hampshire - 0300 555 1373</i>
Childline	0800 1111
NSPCC Helpline	0808 800 5000
Yellow Door	<i>02380 636 312</i>
No Limits	<i>02380 224 224</i>

 The Starfish Promise

Notice. Record. Share. Support.

If something doesn't feel right, don't wait.
Never assume someone else has acted.

Safeguarding is everyone's responsibility.