Thallo
ALTERNATIVE PROVISION

Safeguarding and Child Protection Policy

Thallo Education Ltd.

VERSION: 1.0
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AUTHOR: May MacKay-Morris

Role / information	Name	Contact / detail
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Suffolk safeguarding concerns	Suffolk Customer First	0808 800 4005
Approved by	May MacKay-Morris, Provision Lead	25 September 2026
Next review	Annual review	September 2027, or earlier following relevant change

1. Aims

Thallo Alternative Provision is committed to safeguarding and promoting the welfare of every child and young person who accesses the provision. Safeguarding is everyone's responsibility. We aim to take timely and appropriate action to protect children from harm, identify concerns early, provide or seek appropriate help, and ensure that all staff understand how to recognise, record and report safeguarding concerns.

Thallo provides small, calm, relational and low-arousal education. We recognise that young people attending alternative provision may have experienced disrupted education, anxiety, emotionally based school avoidance, masking or shutdown, SEND, communication differences or previous difficult educational experiences. These factors can create additional vulnerability or make signs of harm harder to recognise. They must never be used to explain away or minimise a safeguarding concern.

2. Legislation and guidance

This policy has regard to current national and local safeguarding guidance, including Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, current statutory information-sharing guidance, the Children Acts 1989 and 2004, the Data Protection Act 2018 and UK GDPR, the Equality Act 2010, the Human Rights Act 1998, the Safeguarding Vulnerable Groups Act 2006, the Female Genital Mutilation Act 2003, the Counter-Terrorism and Security Act 2015 and current Prevent duty guidance. It also has regard to Suffolk Safeguarding Partnership procedures and the Non-School Alternative Provision Voluntary National Standards.

Thallo will review this policy whenever relevant legislation, statutory guidance or local safeguarding procedures change and at least annually.

3. Definitions

For the purposes of this policy, a child is anyone under the age of 18.

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of mental and physical health or development; ensuring children grow up in circumstances consistent with safe and effective care; and taking action to enable the best outcomes.

Child protection is part of safeguarding and concerns action taken to protect a child who is suspected to be suffering, or likely to suffer, significant harm.

4. Equality and additional vulnerability

Thallo is committed to inclusive and anti-discriminatory safeguarding practice. Every child is entitled to the same protection from harm. Staff will consider additional barriers to recognising or disclosing abuse that may affect children with SEND, disabilities or health conditions; children with communication differences; young carers; looked-after or previously looked-after children; children with a social worker; children experiencing discrimination; children with English as an additional language; and children affected by mental health difficulties, domestic abuse, exploitation, poverty, unstable accommodation or other adversity.

Staff will not assume that changes in behaviour, mood, attendance, communication or presentation are simply features of a child's SEND, neurodivergence, anxiety or previous history. Professional curiosity must be maintained.

5. Roles and responsibilities

5.1 All staff, volunteers and contractors

All adults working for or on behalf of Thallo will:

- understand that safeguarding and child protection are everyone's responsibility;
- know the identity and contact arrangements of the DSL and DDSL;
- receive safeguarding induction and role-appropriate updates and training;
- know how to recognise and report abuse, neglect, exploitation and other safeguarding concerns;
- maintain professional boundaries and follow Thallo's Staff Code of Conduct;
- record and report concerns promptly and accurately;
- never promise a child absolute confidentiality;
- act immediately where a child may be at risk of harm, including making a direct referral where necessary if the DSL or DDSL cannot be contacted.

5.2 Designated Safeguarding Lead

The DSL takes lead responsibility for safeguarding and child protection at Thallo, including online safety. The DSL will have sufficient authority, time, training, resources and access to information to carry out the role effectively. The DSL will:

- provide safeguarding advice and support to staff;
- receive and review safeguarding concerns and ensure appropriate action is taken;
- make or support referrals to children's social care, police, Channel, the Disclosure and Barring Service or other relevant bodies where appropriate;
- liaise with the child's commissioning school, local authority caseworker, social worker and other professionals as required;
- ensure safeguarding records are accurate, secure and appropriately transferred;
- understand the provision's filtering and monitoring arrangements and online-safety risks;
- promote a culture in which children are heard and concerns are acted upon;
- ensure safeguarding practice is reviewed in light of incidents, patterns, local learning and changes in guidance.

When the DSL is unavailable, safeguarding concerns must not be delayed. The DDSL will provide safeguarding cover. Whenever neither the DSL nor DDSL can be contacted and a child may be at risk, staff must use the direct referral and emergency routes set out in this policy. The DSL retains overall lead responsibility.

6. Confidentiality and information sharing

Timely information sharing is essential to effective safeguarding. The Data Protection Act 2018 and UK GDPR do not prevent appropriate information sharing for safeguarding purposes. Information will be shared lawfully, proportionately, securely and only with those who need it to protect or support a child.

Staff must not promise to keep a disclosure secret. Where appropriate and safe, parents or carers will be informed about concerns and information sharing. They will not be informed where doing so could place the child or another person at increased risk, prejudice an investigation or otherwise be contrary to safeguarding advice.

7. Recognising abuse, neglect and exploitation

Abuse can occur within or outside the home, in the community, in an organisation or online. It may be perpetrated by adults or by other children. Staff must remain alert to physical abuse, emotional abuse, sexual abuse and neglect, and to specific safeguarding issues including exploitation, domestic abuse, serious violence, trafficking, modern slavery, radicalisation, honour-based abuse, forced marriage and FGM.

Physical abuse
May include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricated or induced illness.

Emotional abuse

Persistent emotional maltreatment that causes severe or adverse effects on emotional development. It may include humiliation, rejection, threats, coercive control, silencing, serious bullying or developmentally inappropriate expectations.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, including contact and non-contact activity. Sexual abuse may occur online and may be perpetrated by adults or other children.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

7.1 Child criminal exploitation and child sexual exploitation

Child criminal exploitation (CCE) and child sexual exploitation (CSE) are forms of abuse. They may involve an imbalance of power and may include coercion, manipulation, deception or exchange for money, status, affection, protection, substances or other perceived benefit. A child may have been exploited even where activity appears consensual. County lines is one form of criminal exploitation. Concerns will be reported to the DSL and referred to external agencies where appropriate.

7.2 Child-on-child abuse

Children can abuse other children. Thallo will never dismiss harmful behaviour as banter, part of growing up or simply a friendship difficulty. Child-on-child abuse may include bullying and cyberbullying, physical abuse, sexual violence, sexual harassment, abuse in intimate relationships, upskirting, initiation or hazing, exploitation, coercion and consensual or non-consensual sharing of nude or semi-nude images.

Reports will be taken seriously. The immediate safety and wishes of the child who may have been harmed will be considered alongside the needs and safety of the child alleged to have caused harm and any other affected children. Where appropriate, individual risk assessments and safety arrangements will be put in place and external safeguarding or police advice sought.

7.3 Sharing of nude or semi-nude images

Any incident involving the sharing of nude or semi-nude images or videos must be reported to the DSL immediately. Staff must not intentionally view, copy, print, share, store or ask a child to

forward the imagery. If imagery is viewed inadvertently, this must be reported. Staff must not investigate the incident themselves or blame or shame the children involved. The DSL will assess immediate risk and determine whether referral to children's social care and/or police is required.

7.4 Female genital mutilation, forced marriage and honour-based abuse

FGM is illegal and is a form of child abuse. Concerns that a child may be at risk of FGM, forced marriage or other honour-based abuse must be reported immediately to the DSL. Where the statutory personal reporting duty applies to a teacher who discovers that FGM appears to have been carried out on a girl under 18, the teacher must make the required report to police and inform the DSL in accordance with safeguarding procedures. Staff must never examine a child to determine whether FGM has occurred.

7.5 Radicalisation, extremism and Prevent

Thallo recognises the safeguarding risk posed by radicalisation and extremism. Staff will receive appropriate Prevent awareness training and will report concerns to the DSL. Concerns will be considered in context and without stereotyping. The DSL will assess risk and may seek advice or make a referral through local Prevent/Channel arrangements, children's social care or police as appropriate.

7.6 Mental health

Mental health difficulties can in some cases be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff are not expected to diagnose mental health conditions. Any mental-health concern that raises a safeguarding issue will be recorded and discussed with the DSL so that appropriate safeguarding and support action can be considered.

8. Responding to concerns and disclosures

If a child makes a disclosure or an adult has a safeguarding concern, the adult should:

- listen carefully and take the child seriously;
- allow the child time to speak and avoid leading or investigative questions;
- remain calm and avoid showing shock or disbelief;
- reassure the child that they have done the right thing by speaking;
- explain that information may need to be shared to keep them or another person safe;
- make an accurate record as soon as possible, using the child's own words where relevant and clearly distinguishing observation from opinion;
- report the concern to the DSL or DDSL without delay.

If a child is suffering or likely to suffer significant harm, or is in immediate danger, action must not be delayed. Anyone may make a referral to children's social care. In an emergency, call 999.

Suffolk safeguarding concerns may be raised through the Children and Young People's Portal. Professional consultation with Suffolk MASH is available on 0345 606 1499. Suffolk Customer First can be contacted on 0808 800 4005. Current local contact routes must be checked if there is any doubt before a non-emergency referral is made.

9. Recording and managing safeguarding information

All safeguarding concerns, discussions, decisions, referrals and outcomes will be recorded promptly and securely. Records will contain a clear summary of the concern, how it was followed up, action taken, decisions reached and the reasons for those decisions.

Safeguarding records will be kept separately from general educational records, with access restricted to those with a professional need to know. Digital records will be appropriately secured and sensitive information will be shared through secure routes. Where a child moves to another setting, relevant safeguarding information will be transferred securely and separately from the main educational record in accordance with applicable guidance and agreed commissioning arrangements.

10. Online safety and mobile technology

Technology is an important part of children's lives and can also facilitate abuse, exploitation and other harm. Online safety is therefore an integral part of Thallo's safeguarding practice.

Thallo's approach addresses the four broad areas of online risk:

- **Content** - exposure to illegal, inappropriate or harmful material;
- **Contact** - harmful interaction with other users, including grooming, exploitation and cyberbullying;
- **Conduct** - online behaviour that causes or increases the likelihood of harm, including sharing sexual imagery;
- **Commerce** - risks including gambling, inappropriate advertising, phishing and financial scams.

Thallo will use proportionate filtering and monitoring arrangements for internet access and devices it provides. The Online Safety Lead is May MacKay-Morris, Provision Lead / DSL, who is responsible for coordinating online-safety arrangements, ensuring online risks are reflected in safeguarding practice, and reviewing arrangements when technology or risk changes. Staff and learners will be given clear expectations for acceptable use. Staff must not take images of learners on personal devices or use personal social-media accounts to establish private relationships with learners.

Any remote learning will use an approved platform and professional accounts, maintain appropriate boundaries and privacy, and follow the same safeguarding reporting procedures as face-to-face provision. Online-safety arrangements will be reviewed regularly and whenever technology or risk changes.

11. Notifying parents and carers

Where appropriate, the DSL will discuss safeguarding concerns with parents or carers. Other staff should seek DSL advice before discussing a safeguarding concern with a parent or carer. Where informing a parent or carer could increase risk to the child or another person, prejudice an investigation or conflict with safeguarding advice, Thallo will seek advice from children's social care or police before making contact.

12. Children with SEND, disabilities or health needs

Children with SEND, disabilities or certain health conditions can face additional safeguarding challenges. Barriers may include communication differences, greater isolation, dependency on

adults, difficulty recognising harmful behaviour, or assumptions that signs of abuse relate to the child's condition. Thallo will use information from the child, family, EHCP or support plans, commissioning setting and relevant professionals to understand individual communication and safeguarding needs and will make reasonable adjustments to enable children to report concerns and participate in safeguarding processes.

13. Children with a social worker and children in care

Where Thallo is aware that a child has a social worker, is looked after or was previously looked after, this information will inform safeguarding, attendance and support decisions. The DSL will liaise with the social worker, commissioning setting, local authority and other relevant professionals and will ensure that appropriate contact and care information is available to staff who need it.

14. Children absent or missing from education/provision

Absence from education, particularly repeated or unexplained absence, can be a safeguarding warning sign. Thallo will maintain accurate attendance records for every commissioned session and will follow agreed attendance-reporting arrangements with parents/carers, the commissioning setting and local authority.

Where a child does not attend an expected session and no satisfactory explanation has been provided, first-day contact procedures will begin promptly. Contact attempts and outcomes will be recorded. Where contact cannot be established, absence is unusual or known vulnerabilities increase risk, the concern will be escalated to the DSL and commissioner without waiting for a fixed number of days.

Where a child meets the applicable definition of a child missing education, Thallo will liaise with the commissioning school/local authority and follow Suffolk's current Children Missing Education procedures, including the applicable reporting requirements. A fixed reporting threshold will never be used to delay earlier safeguarding action where there is concern that a child may be at risk.

If a child leaves Thallo unexpectedly during a session or their whereabouts become unknown, staff will immediately assess risk, inform the DSL, contact the parent/carer and commissioner as appropriate, and contact police where the circumstances indicate immediate risk. Actions and times will be recorded.

15. Concerns or allegations about adults working with children

Any concern or allegation that a member of staff, volunteer, contractor, sessional worker or other adult working with children may have harmed a child, committed an offence against or related to a child, behaved in a way that indicates they may pose a risk of harm, or behaved in a way that raises concerns about their suitability to work with children must be reported immediately.

Concerns about a member of staff or other adult should be reported to the DSL/Provision Lead. If the concern is about the DSL/Provision Lead, or there is a conflict of interest, the concern must bypass the DSL and be raised through the external safeguarding/allegations route, including Suffolk LADO where the LADO criteria may be met. Thallo will seek LADO advice where appropriate and will not undertake an internal investigation that could prejudice safeguarding, police or LADO processes.

Where required following the conclusion of a case, Thallo will make appropriate referrals to the Disclosure and Barring Service and/or the relevant professional regulator, including the Teaching Regulation Agency where applicable. Low-level concerns will also be recorded and reviewed so that patterns of behaviour can be identified.

16. Reporting systems and child voice

Thallo will ensure children know how and to whom they can report a concern. Children may speak to any trusted adult and will be offered communication methods appropriate to their needs. Reporting arrangements will be explained in accessible language and children will be reassured that concerns will be taken seriously.

The child's wishes and feelings will be considered when deciding what action and support are appropriate, while recognising that adults may still need to share information or take protective action even where a child asks them not to.

17. Whistleblowing

Staff, volunteers and contractors must raise concerns about unsafe practice, failures in safeguarding arrangements or attempts to suppress concerns. Concerns may be raised through Thallo's Whistleblowing Policy. Where internal reporting is inappropriate, ineffective or presents a conflict of interest, external safeguarding, LADO, regulatory or whistleblowing routes may be used.

18. Training

All staff will undertake safeguarding and child protection training as part of induction, including online safety, reporting arrangements and whistleblowing. Safeguarding knowledge will be updated regularly through training, briefings, supervision and policy updates. Staff will receive Prevent awareness appropriate to their role.

The DSL will undertake role-appropriate safeguarding training and keep their knowledge and skills current. The DDSL will undertake appropriate role-specific safeguarding training before carrying out the role. Training records will be maintained and made available to commissioners where required. At least one appropriately safer-recruitment-trained person will be involved in recruitment processes where required by Thallo's safer recruitment arrangements.

19. Safer working and professional boundaries

All adults must maintain appropriate professional boundaries and follow Thallo's Staff Code of Conduct and safer-working expectations. Safeguarding requirements apply to face-to-face, off-site and remote activity. One-to-one work, transport, communication, use of technology and activities away from the main provision will be risk assessed and managed proportionately.

20. Monitoring and review

The Provision Lead will monitor the effectiveness of safeguarding arrangements through review of concerns, referrals, attendance, incidents, allegations or low-level concerns, staff training and emerging patterns. Learning from incidents, near misses, local safeguarding practice reviews and commissioner feedback will be used to improve practice.

This policy will be reviewed at least annually and sooner following relevant changes in law or guidance, local safeguarding procedures, the nature of Thallo's provision, or any safeguarding incident that indicates a need for review.

Appendix 1 - Key safeguarding indicators

Indicators of abuse and neglect may be physical, emotional, behavioural, developmental or contextual. No single indicator proves that abuse has occurred. Staff should consider patterns, changes from the child's usual presentation and the wider context, and should share concerns rather than attempting to investigate them.

Possible indicators of exploitation

- unexplained money, gifts or possessions;
- new or concerning relationships or peer groups;
- frequent unexplained absence or travel;
- fear, coercion, injuries or secrecy;
- substance misuse or involvement in offending;
- sexual health concerns or evidence of grooming.

Possible indicators of online harm

- distress linked to devices or online contact;
- secretive or compulsive online activity;
- contact with unknown adults or peers;
- pressure to share images or personal information;
- exposure to harmful, extremist or exploitative content;
- online bullying, threats, scams or coercion.

Possible indicators requiring professional curiosity

- marked changes in attendance, mood or behaviour;
- unexplained injuries or repeated health concerns;
- fear of particular people or places;
- withdrawal, shutdown or unusually heightened anxiety;
- age-inappropriate sexualised behaviour or knowledge;
- persistent hunger, poor hygiene or unmet medical needs.

Appendix 2 - Safeguarding response at a glance

- **Immediate danger or serious emergency:** call 999 and inform the DSL as soon as possible.
- **Safeguarding concern or disclosure:** listen, reassure, record and report to the DSL or DDSL without delay.
- **Unable to contact the DSL or DDSL and a child may be at risk:** make the appropriate safeguarding referral directly; do not wait.
- **Concern about an adult working with children:** report to the DSL/Provision Lead. If the concern relates to that person or there is a conflict, contact Suffolk LADO directly.
- **Unexpected absence:** begin first-day contact promptly, record attempts, assess vulnerability and escalate where appropriate.
- **Online incident or sexual imagery:** do not investigate or circulate material; report immediately to the DSL.