



SAFEGUARDING AND CHILD PROTECTION POLICY

2026–2027

Policy owner	Board of Trustees, Axis Educational Trust
Designated Safeguarding Lead	Mr Hakan Gokce
Review date	15/09/2026
Next review due	September 2027
Applies to	All Axis centres, youth centres, supplementary education, mentoring, employability, holiday/HAF, sports, arts, online provision, trips, partner venues, staff, volunteers, contractors and visitors

Safeguarding principle

The welfare of the child is paramount. Safeguarding is everyone's responsibility. All concerns must be taken seriously, recorded appropriately and acted on without delay.

Safeguarding Contacts

Name / role	Area / contact
Mr Hakan Gokce – Designated Safeguarding Lead	All centres / 020 7607 9330
Miss Rana Urker – Centre Manager / local safeguarding contact	Colindale / 07553 844262
Mr Anil Akcal – Centre Manager / local safeguarding contact	North Finchley / 07897 332376
Mr Zayd Targan – Centre Manager / local safeguarding contact	Ponders End / 07715 022633
East Barnet / New Barnet Youth Centre	Local safeguarding contact to be confirmed before opening; DSL remains Mr Hakan Gokce

Important

Centre Managers are local safeguarding contacts and trained Deputy DSLs. If the DSL or Centre manager is unavailable and a child may be at risk, staff must not delay action: they may contact Children's Social Care/MASH or the Police directly and must record what they have done.

Immediate external contacts

Service	Contact
Emergency – immediate danger	Police / Ambulance: 999
Barnet Children's MASH	020 8359 4066 (office hours); Emergency Duty Team 020 8359 2000
Barnet LADO – concerns about adults working with children	Via Barnet MASH / LADO referral route
Enfield Children's MASH	020 3821 1920; childrensmash@enfield.gov.uk; out of hours 020 8379 1000
Enfield LADO	020 3821 1701
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
Childline	0800 1111

Quick response flow

- If a child is in immediate danger, seriously injured or a crime is in progress: call 999.
- If you have any safeguarding concern: report it to the DSL/local safeguarding contact on the same day. Do not wait for proof.
- If the DSL is unavailable and delay could place a child at risk: contact the relevant MASH/Children's Social Care directly.
- If the concern is about an adult working with children: inform the DSL/Chair unless the concern is about that person, and seek LADO advice promptly.
- Record facts, the child's own words where relevant, decisions and actions. Do not investigate the allegation yourself.

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1. Purpose, scope and legal framework

Axis Educational Trust is committed to safeguarding and promoting the welfare of every child who takes part in its activities. A child is anyone under the age of 18. This policy is organisation-wide and applies to paid staff, sessional workers, freelance tutors, volunteers, trustees, contractors, visitors, partners and anyone acting on behalf of Axis.

The policy applies across Axis tuition centres, supplementary education, youth centres and youth hubs, mentoring, careers and employability activities, holiday/HAF provision, sports and arts activities, online tuition, trips, events, work-experience activity and delivery at partner venues, including school premises where Axis has safeguarding responsibility.

Some Axis programmes include participants aged 18 or 19. Those participants are adults in law. Safeguarding concerns about an adult at risk must be handled under applicable adult safeguarding arrangements. The professional-boundary standards in this policy apply to all participants, including those aged 18 or over.

Axis is not a school or college merely because it provides tuition or supplementary education. Therefore, school-specific legal duties are not assumed to apply automatically. Axis has regard to the legislation and statutory guidance that applies to its activities and uses Keeping Children Safe in Education 2026 as an important benchmark of good safeguarding practice where relevant. For out-of-school provision Axis follows the Department for Education guidance for providers of community activities, after-school clubs and tuition. Where a service is Ofsted registered or within the Early Years Foundation Stage, the applicable regulatory requirements will also be followed.

2. Safeguarding principles and aims

- The welfare and best interests of the child are paramount.
- Safeguarding is everyone's responsibility; concerns should be acted on early rather than waiting for certainty.
- Children should feel safe, listened to, respected and able to identify trusted adults.
- Safeguarding practice must be child-centred, inclusive, anti-discriminatory and sensitive to culture, language, disability and individual circumstances without allowing these factors to excuse or conceal harm.
- Children may be harmed inside or outside the home, by adults or other children, in person or online.
- Axis will work constructively with parents and carers unless doing so could increase risk, prejudice an investigation or conflict with a child's immediate safety.
- Safeguarding records will be accurate, factual, secure and shared only where necessary and lawful.
- Axis will learn from incidents, complaints, low-level concerns, safeguarding audits and the views of children and families.

Aims

- Prevent unsuitable people from gaining access to children through safer recruitment, appropriate checks and clear professional standards.
- Identify abuse, neglect, exploitation, discrimination and emerging vulnerabilities as early as possible.
- Provide staff and volunteers with clear procedures for reporting concerns and disclosures.
- Respond appropriately to child-on-child abuse, online harm, exploitation, serious violence and other contextual risks.
- Promote safe attendance, supervision, premises, trips, digital communication and one-to-one work.
- Work effectively with Children's Social Care, Police, LADO, schools, health services and other agencies where necessary.
- Support children affected by harm and avoid victim-blaming or language that minimises their experiences.

3. Roles and responsibilities

3.1 Board of Trustees

- Own overall accountability for safeguarding governance and ensure adequate resources, policies, training and oversight are in place.
- Review safeguarding assurance, serious incidents, risks, safer recruitment arrangements and significant learning from cases.
- Ensure safeguarding is considered in new projects, property decisions, partnerships, digital systems and fundraising activities involving children.
- Consider whether serious safeguarding incidents must be reported to the Charity Commission and other regulators, without delaying referrals to safeguarding agencies.
- Ensure any concern about the Chair/DSL is managed by an unconflicted trustee and referred externally where appropriate.

3.2 Designated Safeguarding Lead (DSL)

- Provide organisation-wide safeguarding leadership, advice and case oversight.
- Receive, review and securely record safeguarding concerns and disclosures.
- Make or coordinate referrals to Children's Social Care/MASH, Police, Prevent/Channel or other agencies as appropriate.
- Seek LADO advice on allegations or concerns about adults working with children.
- Ensure the child's wishes, feelings, communication needs and best interests are considered.
- Support staff after disclosures and safeguarding incidents and ensure staff do not undertake inappropriate investigations.
- Maintain safeguarding knowledge through formal training at least every two years and ongoing updates at least annually, using KCSIE expectations as a benchmark.
- Monitor patterns across incidents, attendance, child-on-child concerns, online safety and low-level concerns.
- Ensure appropriate information is shared when a child moves between services where necessary for safeguarding.

3.3 Centre Managers and project leads

- Implement this policy locally and ensure staff, volunteers and contractors understand how to report concerns.
- Maintain safe arrival, collection, supervision, visitor and room-use arrangements.
- Escalate safeguarding concerns to the DSL promptly and never delay urgent external referral because the DSL is unavailable.
- Ensure safeguarding induction, attendance records, emergency contacts, medical information and risk assessments are maintained.
- Monitor professional boundaries, staff conduct and local safeguarding risks, including online and community risks.

3.4 All staff, tutors, mentors, volunteers and contractors

- Read and follow this policy, the staff code of conduct and relevant safeguarding procedures before working unsupervised with children.
- Maintain professional curiosity and report concerns even where evidence is incomplete.
- Listen to children, take disclosures seriously and never promise secrecy.
- Report concerns about colleagues, volunteers, contractors or organisational practice, including low-level concerns.
- Use only approved communication channels and maintain professional boundaries online and offline.

- Complete safeguarding training and updates required for their role.

4. Recognising abuse, neglect and exploitation

Safeguarding concerns rarely fit neatly into one category. Multiple forms of harm may overlap and the absence of a disclosure does not mean that a child is safe. Staff should notice changes, patterns and context, and should avoid assuming that behaviour is explained solely by culture, adolescence, disability, language or family circumstances.

Type	Examples / possible indicators
Physical abuse	Unexplained or repeated injuries; fear of going home; inconsistent explanations; deliberate injury; fabricated or induced illness.
Emotional abuse	Persistent humiliation, threats, rejection, coercion, exposure to domestic abuse, severe bullying, controlling behaviour, or developmentally inappropriate expectations.
Sexual abuse	Contact or non-contact abuse, grooming, sexual exploitation, exposure to sexual content, coercion, harmful sexual behaviour, online abuse, or the making/sharing of sexual images.
Neglect	Persistent failure to meet basic physical, medical, emotional, supervisory or educational needs; inadequate food, clothing, shelter, supervision or access to healthcare.
Exploitation	A child being used for another person's advantage, including sexual, criminal or financial exploitation, trafficking, county lines, forced labour or coercive offending.

Professional curiosity

Children may not recognise their experiences as harmful or may be unable or unwilling to disclose because of fear, shame, threats, disability, communication barriers, sexual orientation, language barriers, immigration concerns or loyalty to others. Staff should remain curious and speak to the DSL when something does not feel right.

5. Responding to a concern or disclosure

If a child tells you something

- Listen calmly and give the child your full attention.
- Take the child seriously and reassure them that they have done the right thing by speaking.
- Do not promise confidentiality. Explain that you may need to share information with people who can help keep them safe.

- Do not ask leading questions or press for unnecessary detail. Use open prompts only where clarification is essential.
- Do not investigate, confront an alleged perpetrator, search devices or attempt to verify the child's account yourself.
- Report the concern to the DSL/local safeguarding contact as soon as possible on the same day.
- Make a factual written record as soon as possible and normally within 24 hours, including date, time, place, people present, the child's own words where possible, observations, actions and decisions.
- Preserve any relevant evidence without copying, forwarding or unnecessarily viewing harmful digital material.
- Continue to support the child and follow any safety plan or professional advice.

If the DSL is unavailable

Safeguarding action must not be delayed. Any member of staff may contact Children's Social Care/MASH or the Police directly where necessary. The DSL should be informed as soon as practicable afterwards and the action recorded.

Parents and carers

Parents/carers will usually be involved at an appropriate stage. However, they should not be contacted before professional advice where this could increase the risk to the child or another person, lead to evidence being destroyed, cause the child to be removed or intimidated, or prejudice a police/social care investigation. This is particularly relevant to some sexual abuse, forced marriage, honour-based abuse, FGM and intra-familial abuse concerns.

6. Family Help / Early Help and referrals

Axis recognises the value of support before problems escalate. Staff should identify children and families who may benefit from community support, Family Help/Early Help, school-based support, health services or other voluntary-sector assistance. Seeking early support does not replace a child protection referral where significant harm is suspected.

- Immediate danger or serious crime: call 999.
- Concern that a child may be suffering or likely to suffer significant harm: contact Children's Social Care/MASH promptly.
- Lower-level but emerging needs: discuss with DSL and consider Family Help/Early Help pathways and voluntary/community support.
- Concern about radicalisation: discuss with DSL and seek Prevent/Channel advice where appropriate.
- Concern about an adult working with children: follow the LADO/allegations process, not the ordinary child-referral route alone.

7. Child-on-child abuse, harmful sexual behaviour and sexual violence

Axis has a zero-tolerance approach to child-on-child abuse. This does not mean that every incident is treated identically; it means concerns are never dismissed as "banter", "part of growing up" or harmless because those involved are children. Safeguarding action will be proportionate to risk, need and context.

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Physical abuse, serious violence, threats, weapons and coercion.
- Sexual harassment, sexual violence and harmful sexual behaviour.
- Abusive or controlling behaviour in teenage relationships, including stalking.
- Initiation or hazing-type behaviour.
- Misogynistic or misandrist abuse and harassment.
- Non-consensual making or sharing of nude/semi-nude images, including AI-generated or manipulated images.

- Abusive group-chat messages, online harassment, sharing pornography or abusive images with others who do not want to receive them.
- Abuse that occurs outside Axis premises or online but affects a child's safety, wellbeing or ability to participate in Axis provision.

Responses will consider the safety and support needs of the child harmed and any child alleged to have caused harm. Behaviour management and disciplinary action will be kept distinct from safeguarding assessment. Risk assessments and safety plans may include supervision changes, timetable/group changes, no-contact expectations, parent involvement and referral to specialist services.

8. Specific safeguarding concerns

8.1 Domestic abuse and coercive control

Children can be harmed by seeing, hearing or otherwise experiencing the effects of domestic abuse, and may also experience abuse within their own intimate relationships. Staff should be alert to coercive control, stalking, threats, isolation and technology-facilitated abuse as well as physical violence.

8.2 Child criminal exploitation, county lines and financial exploitation

Signs may include unexplained money or possessions, going missing, association with older or controlling individuals, carrying multiple phones, unexplained travel, injuries, fear, debt, threats, drug involvement or sudden changes in behaviour. Apparent consent does not remove the possibility of exploitation.

8.3 Child sexual exploitation and group-based exploitation

Sexual exploitation may occur in person or online and may involve gifts, status, affection, threats, debt, substances, transport or group pressure. Staff should avoid victim-blaming language and should report concerns promptly.

8.4 Modern slavery and trafficking

Children may be moved, controlled or exploited for criminal, sexual, labour or domestic purposes. Concerns should be referred through safeguarding agencies; statutory partners may consider the National Referral Mechanism where appropriate.

8.5 Serious youth violence, gangs and weapons

Indicators may include increased absence, unexplained injuries, new peer groups, aggression, fear, weapons, county-lines indicators or sudden changes in appearance and behaviour. Immediate weapon or violence risks should be reported to Police.

8.6 Mental health, self-harm and suicide risk

Mental-health difficulties may be a safeguarding concern in themselves or an indicator of abuse, exploitation or trauma. Concerns about self-harm or suicidal thoughts must be shared promptly with the DSL and parent/carers where safe; immediate danger requires emergency medical or police assistance.

8.7 Honour- or faith/belief-based abuse, forced marriage and FGM

No culture, faith, custom or family expectation can justify abuse. Forced marriage is distinct from arranged marriage and is illegal. FGM is child abuse and illegal. Suspected or at-risk cases must be reported immediately to the DSL and safeguarding agencies. Where a member of staff is personally subject to the statutory FGM mandatory reporting duty and a known case meets the legal threshold, that person must make the required police report.

8.8 Radicalisation and terrorism

Axis recognises that children may be susceptible to extremist influence or radicalisation. Concerns should be treated as safeguarding concerns and assessed in context. Axis follows current Prevent principles as applicable and will seek advice/referral through Prevent or Channel where appropriate.

8.9 Racism, discrimination and prejudice-based harm

Racism, faith-based prejudice and other discrimination can affect a child's safety, mental health, belonging and willingness to seek help. Staff must challenge discriminatory practice and treat related concerns as safeguarding matters where harm or vulnerability is present.

8.10 SEND, disability and communication needs

Children with SEND may face additional barriers to disclosure and may be disproportionately affected by bullying or abuse. Staff must avoid attributing injuries, distress or behaviour automatically to disability and must provide accessible ways for children to communicate concerns.

8.11 Refugee, asylum-seeking, migrant and newly arrived children

Displacement, trauma, insecure housing, language barriers, separation from family, unfamiliarity with UK systems and fear of authorities can increase vulnerability. Staff should use interpreters or accessible communication where necessary and should not allow immigration or cultural assumptions to obscure safeguarding concerns.

8.12 Looked-after children, kinship care, private fostering and young carers

Staff should be aware that care arrangements, parental illness, caring responsibilities or private fostering may create additional needs. Where private fostering is identified, the DSL should seek local-authority advice. Relevant social-worker or care-plan information should be obtained where necessary for safety.

9. Online safety, technology and artificial intelligence

Online safeguarding is part of safeguarding, not a separate issue. Axis considers four broad areas of online risk: content, contact, conduct and commerce. Risks can include harmful or illegal material; grooming or unwanted contact; bullying, sexual-image sharing or abusive behaviour; and scams, gambling, inappropriate advertising, phishing or financial exploitation.

- Axis-managed networks and devices will use proportionate filtering and monitoring arrangements where technically available and appropriate to the service.
- The effectiveness of filtering, monitoring, access controls and online-safety arrangements will be reviewed at least annually and after significant incidents.
- Children will receive age-appropriate guidance on privacy, scams, grooming, cyberbullying, harmful content, image sharing and responsible AI use.
- Staff must not use generative AI tools in ways that expose children's personal or safeguarding information to unauthorised services.
- AI-generated, altered or "deepfake/deep nude" sexual imagery involving children is treated as a safeguarding matter.
- Staff must use organisation-approved accounts and platforms for communication with children and families wherever possible.
- Any online safeguarding concern must be reported and recorded in the same way as an offline concern.

Nudes and semi-nudes, including AI-generated imagery

- Do not ask a child to forward the image to you.
- Do not print, copy, save, forward or unnecessarily view the image.
- Report the incident immediately to the DSL.
- Preserve information about the context, platform and people involved without undertaking an independent investigation.
- The DSL will assess risk, seek specialist/police/social-care advice as appropriate and consider support for all children involved.

10. Children absent or missing from Axis provision

Axis is not a school and does not apply statutory school admission-register rules to its tuition/youth-centre attendance. However, unexplained, repeated or concerning absence from Axis provision may be a safeguarding indicator and will be followed up proportionately.

- Attendance is recorded for scheduled activities.
- Where a child expected to attend is absent without explanation, the centre may contact the parent/carer, particularly where absence is unusual, repeated or linked to an existing concern.
- Patterns of absence, sudden disengagement or unexplained withdrawal should be considered in the wider safeguarding context.
- If a child goes missing during an Axis activity, staff must immediately check the premises and agreed safe areas, inform the Centre Manager/DSL and parent/carer, and contact Police where risk warrants it.
- Children arriving before their session must remain in the designated reception/waiting area until the tutor, teacher or activity leader is present. Children must not enter classrooms or activity rooms unsupervised.
- Children must not leave the premises during supervised provision unless authorised arrangements are in place.

11. Safer recruitment, suitability and DBS checks

Axis will use safer recruitment processes proportionate to each role and will not rely on a DBS certificate as the sole indicator of suitability. Recruitment decisions should consider identity, right to work where applicable, employment history, references, qualifications, role competence, safeguarding attitudes and any relevant checks permitted by law.

- Job descriptions and role information will state safeguarding responsibilities where the role involves children.
- Applicants should provide a complete work/education history and explain significant gaps.
- References should be obtained from appropriate sources and safeguarding concerns explored before appointment where possible.
- Interviews should test safeguarding judgement, boundaries and suitability to work with children.
- Axis may carry out proportionate online due-diligence searches on shortlisted candidates as part of safeguarding assessment, with candidates informed of the process.
- Employees, freelance/self-employed tutors, mentors, coaches, contractors and volunteers will receive the level of DBS check for which the role is legally eligible. Children's barred-list information will only be requested where legally permitted and relevant to regulated activity.
- The 2026 changes to regulated activity mean that supervision no longer automatically removes teaching, training, instruction, care or supervision from regulated activity where the statutory conditions are met. Axis will assess each role against the current legal definition.
- A volunteer or worker for whom required checks have not been completed must not be left unsupervised or allowed to undertake regulated activity.
- Overseas history and additional suitability checks will be considered where relevant.

- Where Childcare Act disqualification rules apply to a role or registered provision, Axis will follow the current statutory guidance.
- All required staff documents, DBS details, safeguarding training and relevant qualifications should be recorded securely in Axis systems.

12. Allegations and concerns about adults working with children

Any allegation or concern about an employee, tutor, volunteer, trustee, contractor, supply worker, partner or other adult working with children must be reported promptly. The following harm threshold is used as a benchmark for deciding when LADO advice is required.

- The adult has behaved in a way that harmed a child, or may have harmed a child.
- The adult may have committed a criminal offence against or related to a child.
- The adult has behaved towards a child or children in a way indicating that they may pose a risk of harm.
- The adult has behaved, or may have behaved, in a way indicating that they may not be suitable to work with children, including relevant behaviour outside work (“transferable risk”).

Concerns meeting or potentially meeting the threshold should be discussed with the relevant LADO promptly and, where the local procedure requires it, within one working day. Police or Children’s Social Care must be contacted immediately where necessary for safety or criminal investigation.

Suspension is not an automatic response. Any decision to suspend or alter duties should be risk-based, proportionate and informed by LADO/police/social-care advice where appropriate. Axis will continue necessary investigations and regulatory referrals even if the person resigns or stops providing services.

Where the concern is about the DSL/Chair, it must be reported to another unconflicted trustee and/or directly to the relevant LADO. The person who is the subject of the concern must not control the response.

13. Low-level concerns

A low-level concern is not insignificant. It is any concern, however small, that an adult working with or on behalf of Axis may have acted in a way that is inconsistent with the staff code of conduct but does not appear to meet the harm threshold. This may include a sense of unease or a “nagging doubt”.

- Being over-friendly or developing an inappropriate special relationship with a child.
- Favouritism, gifts or private contact that falls outside expected professional boundaries.
- Inappropriate use of personal phones, social media or photography.
- Humiliating, intimidating or inappropriate language.
- Unnecessary secluded one-to-one situations or behaviour that could reasonably be misinterpreted.
- Conduct outside work that may be inconsistent with expected safeguarding standards.

Low-level concerns should be reported to the DSL/Chair or nominated senior manager, recorded confidentially and reviewed for patterns. Staff are encouraged to self-refer when they recognise that their own actions may have been misinterpreted or fallen below expected standards. Where there is doubt about whether the harm threshold is met, LADO advice will be sought.

14. Professional boundaries and safer working practice

- Adults must behave in an open, transparent and accountable way and avoid conduct that could reasonably be interpreted as grooming, favouritism, coercion or a sexual/romantic relationship.
- Sexual or romantic conduct with any participant under 18 is prohibited. Professional boundaries must also be maintained with participants aged 18 or over where there is a position of responsibility or power imbalance.

- Staff should not share personal social-media accounts, private photographs, intimate personal information or inappropriate gifts with children.
- Physical contact must be necessary, proportionate and appropriate to the activity or child's needs. It must never be used as punishment or intimidation.
- Reasonable physical intervention may only be used where lawful and necessary to prevent injury, serious disorder or significant property damage, and must be reported and recorded.
- Staff should not arrange private meetings, lifts, home visits or social contact with children outside approved Axis arrangements.
- Concerns about professional boundaries must be reported even if no child has complained.

15. One-to-one work, mentoring and counselling

One-to-one support is a legitimate part of Axis provision but requires appropriate safeguards. The same standards apply regardless of the gender of the child or adult.

- Use an appropriate, observable environment wherever possible; doors must not be locked.
- Where privacy is required for pastoral or counselling work, appropriate visibility and safeguarding arrangements should remain in place.
- The purpose, expected duration and location of one-to-one work should be known to the centre/project lead.
- Formal therapeutic counselling must only be delivered by appropriately qualified people and under a clear service/consent arrangement.
- Online one-to-one tuition or mentoring must use approved accounts/platforms and should be capable of appropriate organisational oversight.
- Staff must report disclosures or safeguarding concerns arising during one-to-one work in the normal way.

16. Communication, social media, photography and recording

- Communication with children and parents should use Axis-approved systems, business numbers, LMS functions or other authorised channels wherever possible.
- Staff should not normally use private social-media accounts or establish personal messaging relationships with children.
- Where direct communication with an older young person is operationally necessary, it must be professional, transparent, limited to the programme purpose and capable of organisational oversight.
- Personal devices should not normally be used to take or retain photographs/videos of children. Approved devices/accounts should be used for organisational photography.
- Photographs or recordings used publicly require the appropriate consent/authorisation arrangements. Child assent should be respected, and safeguarding concerns override promotional considerations.
- Images must not be published with unnecessary identifying information, and geolocation/location data should be considered before publication.

17. Premises, supervision, visitors and contractors

- Entry and exit arrangements should be controlled and appropriate to the venue and activity.
- Visitors should sign in where applicable, be identifiable and be supervised where required.
- Children should remain within supervised areas and must not access classrooms/activity rooms without staff present.
- Supervision levels should reflect age, activity, SEND/medical needs, venue layout and known risks.
- Contractors working where children are present must be managed through appropriate risk assessment, identification, supervision and DBS arrangements where applicable.

- Unsafe strangers, suspicious activity, weapons or immediate threats should be escalated to management and Police as appropriate.
- CCTV, where used, must be managed lawfully and must not replace appropriate staff supervision.

18. Trips, transport, host families and off-site activity

- Trips and off-site activities require proportionate risk assessment, emergency contacts, supervision and parent/carer information/consent appropriate to the activity.
- Private vehicle transport of children should be exceptional, authorised and subject to appropriate licence, insurance, safeguarding and parental arrangements. Avoid one adult transporting one child alone wherever practicable.
- Residential or overnight activity requires enhanced safeguarding planning, sleeping arrangements, medication procedures and emergency response.
- Where Axis arranges host-family accommodation, suitability and current legal/DBS requirements must be considered. Where families make private arrangements themselves, Axis should still act on any safeguarding concern that comes to its attention.
- When children attend activities delivered by another provider, Axis should obtain reasonable assurance about safeguarding arrangements where Axis is organising or commissioning the activity.

19. First aid, medical needs and emergency response

- Appropriate first-aid arrangements and trained staff will be available according to the venue/activity risk assessment.
- First-aid treatment and significant incidents will be recorded and shared with parents/carers as appropriate.
- Medication will be administered only under agreed procedures and with appropriate parent/carer information and consent, except in emergencies where immediate life-saving action is required.
- Long-term medical needs, allergies, SEND requirements and emergency plans should be recorded and shared with staff who need the information to keep the child safe.
- Emergency services will be called where necessary; safeguarding concerns arising from an injury or medical presentation must still be reported to the DSL.

20. Information sharing, confidentiality and safeguarding records

Safeguarding depends on timely and proportionate information sharing. Axis will handle safeguarding information in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025 and current government information-sharing guidance, where applicable.

- Data protection law is not a barrier to sharing information where sharing is necessary, lawful and proportionate to safeguard a child.
- Staff must never promise a child absolute confidentiality.
- Consent should be considered where appropriate, but safeguarding information may be shared without consent where there is a lawful basis and seeking consent could increase risk, prejudice an investigation or cause unreasonable delay.
- Information should be shared only with people who need it for safeguarding, support or legal/regulatory purposes.
- Safeguarding records should be factual, dated, attributable, secure and stored separately from routine educational records where appropriate, with access restricted.
- Records should include the concern, context, child's views where relevant, decisions, referrals, advice received, information shared and rationale for action or no action.

- Safeguarding information may be shared with a new provider, school or agency where necessary to protect the child. Secure transfer and confirmation of receipt should be used where appropriate.
- Axis will retain safeguarding records in accordance with its retention schedule, legal/regulatory requirements and safeguarding need.

Information Sharing Duty 2026

The updated statutory information-sharing guidance takes effect from 30 September 2026 for organisations and practitioners within scope. Axis will apply the current duty where it is legally applicable and will use the guidance as a benchmark across its safeguarding practice.

21. Whistleblowing, complaints and escalation

Staff and volunteers must be able to raise safeguarding concerns without fear of retaliation. Concerns about unsafe practice, failure to act, concealment of safeguarding information or breaches of procedure should be reported through Axis management or directly to an appropriate external body where internal reporting is unsafe or ineffective.

- A concern about the DSL/Chair should be raised with another unconflicted trustee and/or the LADO or safeguarding authority.
- Staff may contact Children's Social Care or Police directly if they believe a child remains at risk.
- The NSPCC Whistleblowing Advice Line (0800 028 0285) is available for concerns about how an organisation is handling child protection.
- Safeguarding complaints will be considered separately from ordinary service complaints where necessary so that child protection action is not delayed.

22. Training, induction and safeguarding culture

- All staff and volunteers receive safeguarding information appropriate to their role before or at induction and regular updates thereafter.
- Axis requires at least annual safeguarding updates for staff working with children, with additional briefings when significant guidance or local risks change.
- The DSL will undertake formal safeguarding training at least every two years and maintain knowledge through ongoing updates, network learning and case-review learning.
- At least one appropriately trained person should be involved in significant recruitment processes.
- Training will cover disclosures, child-on-child abuse, online safety, professional boundaries, low-level concerns, safer recruitment as appropriate, Prevent/radicalisation, SEND barriers, exploitation and local referral routes.
- Safeguarding culture will be reinforced through staff meetings, supervision, audits, case reflection and clear leadership expectations.

23. Partner organisations, room hire and commissioned services

Where another organisation delivers activities on Axis premises or Axis commissions a partner to work with children, safeguarding responsibilities must be clear in writing.

- Obtain and review appropriate safeguarding/child protection and safer recruitment arrangements.
- Identify the partner's safeguarding lead and emergency contact.
- Clarify which organisation leads on incidents, records, parent communication and external referrals.
- Include safeguarding clauses in SLAs, room-hire or partnership agreements where appropriate.
- Take reasonable steps to ensure the organisation is suitable to work with children and does not promote harmful, extremist, discriminatory or illegal activity.

- Any safeguarding concern identified by Axis staff must still be acted on even where another organisation has primary responsibility for the activity.

24. Charity governance, Ofsted and external reporting

- The DSL will inform the Chair/Trustees of serious safeguarding matters on a need-to-know basis while protecting confidentiality.
- Trustees will consider whether an incident meets the Charity Commission's serious-incident reporting criteria and make any required report without delaying child-protection action.
- Where an Axis service is Ofsted registered, the registered person will make any notification required by the applicable register, EYFS or childcare requirements.
- Axis will make required referrals to the Disclosure and Barring Service where the statutory conditions are met, including where a person is removed from regulated activity because they harmed, posed a risk of harm, or would have been removed had they not left.
- Professional regulator, funder, insurer or commissioning-body notifications will be made where required and appropriate.

25. Monitoring, audit and review

- Annual organisation-wide safeguarding policy review and local contact check.
- Periodic safeguarding audits of centres and projects, including arrival/collection, supervision, records, training and DBS documentation.
- Review of safeguarding concerns, child-on-child incidents, low-level concerns, complaints, attendance patterns and online-safety incidents for themes.
- Child and parent feedback through surveys, discussions and complaints/feedback mechanisms.
- Review of partner and contractor safeguarding assurance.
- Prompt policy review after serious incidents, significant legal/guidance changes or identified weaknesses, rather than waiting for the annual review date.

This policy was reviewed on 15/09/2026. The next scheduled review is September 2027, or earlier if required by changes in law, guidance, organisational activity or safeguarding learning.

Appendix A – Indicators of abuse and vulnerability

The following indicators are not exhaustive and do not prove abuse. A pattern, combination of signs or unexplained change may be more significant than a single indicator. Staff should record what they observe and speak to the DSL rather than attempting diagnosis.

Physical abuse

- unexplained injuries or repeated accidents
- injuries inconsistent with explanation or developmental ability
- fear of a particular adult or of going home
- flinching, concealment of injuries or unusual clothing

Emotional abuse

- persistent low self-worth, fear or withdrawal
- extreme compliance or aggression
- developmental regression
- persistent humiliation, threats or rejection

Sexual abuse

- sexualised behaviour or knowledge not expected for age
- pain, injury or infection with no clear explanation
- fear of a person or place
- grooming indicators, unexplained gifts, secrecy or online contact

Neglect

- persistent hunger, poor hygiene or inadequate clothing
- untreated medical needs
- frequent lack of supervision
- persistent tiredness, poor attendance or developmental concerns

Exploitation / county lines

- going missing, unexplained travel or taxis
- multiple phones, unexplained cash or possessions
- new controlling peers/adults
- injuries, threats, debt, fear or drug involvement

Online harm

- sudden distress after device use
- secretive accounts or unknown contacts
- sexual image requests or threats
- phishing/scams, gambling, financial pressure or coercion

Mental-health / self-harm

- expressions of hopelessness or suicidal thoughts
- self-injury or unexplained wounds
- extreme withdrawal, anxiety or rapid behavioural change
- giving away possessions or statements suggesting finality

Appendix B – Children absent or missing from Axis provision

Unexplained absence from a scheduled session

- Check the register and any known parent notification.
- Consider whether there is an existing safeguarding concern, unusual pattern or vulnerability.
- Contact parent/carers where appropriate and proportionate.
- Escalate repeated or concerning absence to the DSL.
- Record safeguarding action where absence forms part of a wider concern.

Child missing during an activity

- Confirm when and where the child was last seen and check immediate safe areas without leaving other children unsupervised.
- Inform Centre Manager/project lead and DSL immediately.
- Contact parent/carers unless advised otherwise for safeguarding reasons.
- Call Police promptly where the child cannot be located or risk is significant.

- Preserve relevant CCTV, sign-in information and witness details.
- Record the incident and review supervision/risk controls afterwards.

Appendix C – Managing allegations and low-level concerns

Concern may meet harm threshold

- Protect the child from immediate risk.
- Report to the DSL/Chair unless the concern is about that person.
- Do not investigate beyond necessary initial fact-gathering.
- Seek LADO advice promptly; contact Police/Children’s Social Care where required.
- Consider temporary risk-management measures; suspension is not automatic.
- Record advice, decisions and actions.
- Consider DBS, Ofsted, regulator and Charity Commission reporting duties after immediate safeguarding action.

Low-level concern

- Report the concern promptly.
- Record the concern, context, person reporting and action taken.
- Review for patterns and links with earlier concerns.
- Address conduct proportionately through supervision, guidance, disciplinary action or escalation as appropriate.
- Consult LADO if there is doubt about threshold.

Appendix D – Online safety and image-sharing response

Four areas of online risk

Area	Examples
Content	Pornography, violence, extremist material, self-harm content, misinformation and harmful AI-generated content.
Contact	Grooming, exploitation, coercion, unwanted sexual contact, strangers or abusive peers.
Conduct	Cyberbullying, harassment, making/sharing nudes, abusive group chats, impersonation and misuse of AI.
Commerce	Scams, phishing, online gambling, inappropriate advertising, financial exploitation and fraudulent purchases.

If sexual imagery involving a child is reported

- Do not ask to see or receive the image unless unavoidable for immediate safeguarding and specifically advised.
- Do not copy, forward, print or store the image.
- Take the child’s report seriously and preserve contextual information.
- Report immediately to the DSL.

- DSL assesses risk and seeks police/social-care/UKCIS-informed advice as appropriate.
- Provide support and avoid victim-blaming.

Appendix E – Prevent and radicalisation

Radicalisation is a safeguarding concern where a child is being influenced toward terrorism or support for terrorism. There is no single profile of a child at risk. Assessment should be based on behaviour, context, vulnerability and credible indicators rather than ethnicity, religion or political opinion.

- Sudden fixation on extremist or terrorist material or networks.
- Evidence of grooming, recruitment or pressure by others.
- Expressed support for terrorist violence or intention to travel for terrorist purposes.
- Significant behavioural change combined with concerning online/offline associations.
- Isolation, identity crisis, grievance or discrimination may increase vulnerability but are not evidence of extremism by themselves.

Concerns should be shared with the DSL and assessed under current Prevent/Channel arrangements where appropriate. Immediate threats or criminal conduct should be reported to Police.

Appendix F – Key references and useful organisations

Children Act 1989 and Children Act 2004, as amended – [link](#)

Working Together to Safeguard Children 2026 – Department for Education – [link](#)

Keeping Children Safe in Education 2026 – Department for Education (used by Axis as a safeguarding benchmark where relevant) – [link](#)

Out-of-school settings: safeguarding guidance for providers – updated February 2026 – [link](#)

What to do if you're worried a child is being abused – advice for practitioners – [link](#)

Information sharing to safeguard children and young people – updated September 2026 – [link](#)

Prevent Duty Guidance: England and Wales (2023), current version – [link](#)

Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 – [link](#)

Disqualification under the Childcare Act 2006 – statutory guidance, 2018, where applicable – [link](#)

Early Years Foundation Stage statutory framework – current September 2026 version, where applicable – [link](#)

Mandatory reporting of FGM: procedural information – [link](#)

The Right to Choose – statutory and practice guidance on forced marriage, updated 2023 – [link](#)

Sharing nudes and semi-nudes: advice for education settings working with children and young people – [link](#)

Guidance for Safer Working Practice for those working with children and young people in education settings – Safer Recruitment Consortium, 2022 – [link](#)

Barnet Council – Keeping children safe / MASH – [link](#)

Barnet Council – Local Authority Designated Officer (LADO) – [link](#)

Enfield Safeguarding – Making a safeguarding referral – [link](#)

Enfield Safeguarding – Allegations against adults working with children (LADO) – [link](#)

NSPCC Whistleblowing Advice Line – [link](#)

Related Axis policies and procedures

- Staff Code of Conduct / Safer Working Practice
- Safer Recruitment Policy
- Behaviour Policy
- Anti-Bullying Policy
- Online Safety / Acceptable Use Policy

- Whistleblowing Policy
- Complaints Policy
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- First Aid / Medical Procedures
- Data Protection / Privacy Policy
- Trips / Risk Assessment procedures
- Safeguarding Adults procedure for participants aged 18+ where applicable

Policy Review Record

Field	Details
Policy	Safeguarding and Child Protection Policy 2026–27
Reviewed by	Mr Hakan Gokce – Designated Safeguarding Lead
Review date	15/09/2026
Next scheduled review	September 2027
Earlier review	Required if legislation/guidance changes, a serious incident occurs, or safeguarding audit identifies material changes