Divergent Learning Community CIC

Safeguarding Policy

Policy Owner:	Designated Safeguarding Lead
Approved By:	DLC Founder Claudia Celi
Date of Approval:	25 February 2026 (v2 updated 18 November 2026)
Review Date:	Annually or following significant incident

1. Purpose and Scope

Divergent Learning Community (DLC) is committed to creating a safe, supportive environment where every child and young person can thrive, learn, and develop their unique strengths. This Safeguarding Policy establishes our approach to protecting and promoting the welfare of all children in our care.

This policy applies to all adults working with or on behalf of DLC, including community members, volunteers, visitors, and contractors. It operates alongside our other policies and procedures to ensure comprehensive protection for children aged 7-16 participating in DLC programmes.

2. Our Values and Approach

DLC recognises that safeguarding thrives in communities built on mutual respect, trust, and shared responsibility. Our approach reflects our core values:

- **Genuine Participation:** Children have meaningful voice in decisions affecting their learning and wellbeing. We listen to and act upon children's views, concerns, and experiences.
- **Celebrating Diversity:** We recognise that every brain is unique. Our safeguarding practice respects different ways of thinking, communicating, processing information, and experiencing the world.
- **Strengths-Based Support:** We identify and build upon each child's strengths whilst providing appropriate support for their individual needs.
- **Shared Responsibility:** Safeguarding is everyone's responsibility. We work collaboratively with children, families, and external partners.
- **Early Support:** We believe in identifying concerns early and providing support before situations escalate.

3. Scope of DLC's Support

DLC provides educational programmes designed for children who learn differently and benefit from flexible, participatory approaches. We support a wide range of learning profiles and individual needs through our specialised pedagogical framework.

However, DLC does not currently have the specialist resources, facilities, or trained personnel to support children with complex cognitive needs that require:

- Intensive one-to-one support throughout the day
- Specialist therapeutic interventions
- Medical or clinical support during programme hours
- Specialist equipment or environmental adaptations
- Crisis intervention or emergency mental health support

During our application process, we work openly with families to understand each child's individual profile and determine whether DLC can appropriately meet their needs. This honest conversation ensures every child receives education in an environment equipped to support them effectively. Where DLC is not the right match, we are happy to discuss alternative educational options that may better serve the child's requirements.

This clarity about scope does not reflect any limitation in the children themselves. Rather, it reflects DLC's current capacity and resources. As we grow and develop, we remain committed to expanding our ability to support increasingly diverse learning needs.

4. Legal Framework

This policy is informed by and complies with key legislation and statutory guidance, including:

- Children Act 1989 and 2004
- Education Act 2002
- Keeping Children Safe in Education (latest statutory guidance)
- Working Together to Safeguard Children (latest statutory guidance)
- United Nations Convention on the Rights of the Child
- Data Protection Act 2018 and UK GDPR
- Equality Act 2010
- Counter-Terrorism and Security Act 2015 (Prevent duty)

5. Key Definitions

Safeguarding and promoting the welfare of children means: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with the

provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse and neglect are forms of maltreatment. Abuse may be physical, emotional, sexual, or involve neglect. It may occur in person or online and may be perpetrated by adults or other children.

6. Roles and Responsibilities

6.1 Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and child protection at DLC. This includes:

- Acting as the first point of contact for safeguarding concerns
- Making referrals to local authority children's social care and other agencies where appropriate
- Liaising with the Local Authority Designated Officer (LADO) regarding allegations against adults
- Maintaining detailed, accurate, and secure safeguarding records
- Coordinating safeguarding training for all DLC community members
- Ensuring this policy is reviewed and updated regularly

Current DSL: Claudia Celi

6.2 All Community Members

Every adult working with or on behalf of DLC shares responsibility for safeguarding. This includes:

- Reading and understanding this policy and related safeguarding procedures
- Being alert to signs that a child may be experiencing harm or be at risk
- Listening to children and taking their concerns seriously
- Recording concerns accurately and reporting them promptly to the DSL
- Maintaining appropriate professional boundaries with children
- Understanding and following DLC's code of conduct
- Attending regular safeguarding training

6.3 Founder

The Founder ensures that DLC meets its safeguarding responsibilities by:

- Appointing a Designated Safeguarding Lead with lead responsibility for safeguarding
- Ensuring this policy is implemented effectively and reviewed annually
- Ensuring adequate resources for safeguarding, including training and DSL time
- Monitoring safeguarding practice through regular reports from the DSL

7. Recognising Concerns

All team members receive training to recognise signs that a child may be experiencing harm. These may include but are not limited to:

- Physical indicators such as unexplained injuries, neglect of physical care, or inappropriate clothing
- Changes in behaviour, mood, or engagement
- Regression in development or learning
- Disclosure of concerning experiences, either directly or indirectly
- Knowledge or concerns about circumstances at home
- Concerning online behaviour or content

We recognise that children who think and process information differently may communicate distress or discomfort in ways that differ from typical expectations. Team members are trained to recognise diverse communication styles and to respond appropriately when children express concerns in their own way.

We also recognise specific safeguarding concerns including: child sexual exploitation, child criminal exploitation, peer-on-peer abuse, online safety, radicalisation, domestic abuse, mental health, and serious violence.

8. Responding to Concerns

8.1 If a Child Discloses Abuse

When a child shares information about possible abuse or harm:

- **Listen** carefully and attentively without interrupting
- **Accept** what the child says without judgement
- **Reassure** the child that they were right to tell you
- **Do not promise** confidentiality – explain that you need to share information to keep them safe
- **Do not ask leading questions** or investigate
- **Record** the discussion accurately, using the child's own words where possible
- **Report** to the DSL immediately

8.2 Recording Concerns

All safeguarding concerns must be recorded promptly and accurately using DLC's safeguarding recording system. Records should include:

- Date, time, and location of the concern or disclosure
- Factual description of what was observed or disclosed
- Child's own words (in quotation marks)
- Any action taken
- Name and signature of the person recording

Records must be factual and distinguish clearly between observation, allegation, and opinion. They are stored securely and shared only with those who need to know.

8.3 DSL Action

Upon receiving a safeguarding concern, the DSL will:

- Assess the information and determine appropriate next steps
- Consult with external safeguarding professionals if needed
- Make referrals to local authority children's social care if a child is suffering or likely to suffer significant harm
- Contact police if a child is in immediate danger or a crime may have been committed
- Liaise with parents/carers unless doing so would place the child at increased risk
- Maintain records and monitor the situation

9. Information Sharing

Effective safeguarding requires appropriate information sharing. DLC follows the seven golden rules of information sharing:

- The Data Protection Act 2018 and UK GDPR are not barriers to sharing information to protect children
- Be open and honest about why, what, how, and with whom information will be shared
- Seek consent to share information unless doing so would place a child at increased risk
- Consider safety and wellbeing: base information sharing decisions on whether it will enhance protection
- Share necessary, proportionate, relevant, adequate, accurate, timely, and secure information
- Keep records of information sharing decisions and reasons
- If in doubt, seek advice from the DSL or external safeguarding professionals

10. Safer Recruitment

DLC follows safer recruitment practices to ensure adults working with children are suitable. This includes:

- All job descriptions clearly state safeguarding responsibilities
- Application forms gather sufficient information to assess suitability
- Interviews explore candidates' understanding of safeguarding and suitability to work with children
- References are obtained and verified before appointment
- Enhanced DBS checks with barred list information are obtained for all community members and volunteers
- Identity and right to work checks are completed
- Professional qualifications are verified where relevant
- A single central record tracks all safer recruitment checks
- All new team members complete safeguarding induction training

11. Training and Support

All DLC team members receive safeguarding training appropriate to their role:

- **Induction training** covering this policy, recognising concerns, and reporting procedures
- **Regular updates** throughout the year on emerging safeguarding issues
- **Annual refresher training** for all team members
- **Specialist DSL training** updated every two years for the DSL (and any Deputy DSL, once appointed)

Training addresses the specific context of supporting children who learn differently, including recognising diverse communication styles, understanding sensory processing differences, and responding appropriately to varying emotional regulation needs.

12. Allegations Against Adults

Any allegation that an adult working with children has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates unsuitability to work with children
- Behaved in a way that indicates they may not be suitable to work with children (transfer of risk)

must be reported immediately to the DSL, who will contact the Local Authority Designated Officer (LADO) within one working day. The LADO will advise on

appropriate action, which may include investigation, risk assessment, or referral to police or social care.

DLC will cooperate fully with any investigation whilst providing appropriate support to all parties involved.

13. Online Safety

DLC recognises that online environments present both learning opportunities and safeguarding risks. Our online safety approach includes:

- Appropriate filtering and monitoring arrangements for any devices and networks used during DLC sessions, including children's own devices
- Teaching children to use technology safely, responsibly, and respectfully
- Clear acceptable use agreements for adults and children
- Procedures for responding to online safety incidents
- Working with families to promote consistent online safety messages

Community members receive training on online safety risks and how to support children navigating digital spaces safely.

14. Physical Contact and Personal Care

DLC maintains professional boundaries whilst recognising that some physical contact may be appropriate and necessary. All team members understand:

- Physical contact should always be child-led and appropriate to the situation
- Children's preferences regarding physical contact must be respected
- Physical contact for behaviour management is never acceptable
- Any necessary physical intervention must follow DLC's behaviour policy and be recorded
- Intimate care needs require clear plans agreed with parents and implemented with dignity

15. Photography and Images

DLC obtains explicit consent from parents before taking or using photographs or videos of children. When consent is given:

- Images are taken and stored securely on DLC devices only
- Images are used only for agreed purposes (e.g., website, newsletters, social media)
- Children are appropriately clothed and images do not reveal personal information
- Full names are not used alongside images unless specifically consented
- Children's views on being photographed are respected

16. Confidentiality and Information Security

DLC recognises that safeguarding information is highly sensitive. We maintain confidentiality by:

- Sharing information only with those who need to know to protect the child
- Storing safeguarding records securely and separately from general records
- Following data protection requirements whilst prioritising child safety
- Transferring safeguarding records securely if a child moves to another setting

17. Working with Families

DLC believes that effective safeguarding works in partnership with families. We:

- Share our safeguarding approach openly with families during the application process
- Encourage open dialogue about children's wellbeing and any concerns
- Work collaboratively with parents to support children's safety and welfare
- Communicate promptly about safeguarding concerns unless this would increase risk to the child
- Signpost families to additional support services when appropriate

18. Multi-Agency Working

DLC recognises that protecting children requires effective collaboration with other agencies. We work cooperatively with:

- Local authority children's social care
- Police
- Health services
- Educational psychology and SEND services
- Local Safeguarding Children Partnership
- Other education providers

We contribute to multi-agency assessments, attend meetings as requested, and share information appropriately to support comprehensive safeguarding responses.

19. Monitoring and Review

This policy is reviewed annually by the DSL and Founder, or sooner if:

- Legislation or statutory guidance changes
- Following a serious safeguarding incident
- Local Safeguarding Children Partnership procedures are updated
- Feedback suggests improvements are needed

The DSL provides termly safeguarding reports to the Founder, including:

- Number and nature of concerns raised
- Actions taken and outcomes
- Training delivered
- Policy compliance
- Any areas requiring improvement

20. Key Contacts

Internal Contacts:
Designated Safeguarding Lead: Claudia Celi | DivergentLearningCommunity@outlook.com | 07757 749097
As DLC grows, additional safeguarding roles will be designated. Currently all safeguarding matters are the responsibility of the Founder and Designated Safeguarding Lead.

External Contacts:
Local Authority Children's Social Care:
Hillingdon Stronger Families Hub
Tel: 01895 556 006
Email: strongerfamilieshub@hillingdon.gov.uk
Local Authority Designated Officer (LADO):
Hillingdon LADO — referrals must be submitted via the online contact form at:
https://www.hillingdon.gov.uk/article/11545/LADO-Contact-Form

Contact & Legal Information
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This policy was first approved on 25 February 2026, updated on 18 November 2026 (version 2), and will be reviewed by 18 November 2027.
Divergent Learning Community is committed to safeguarding and promoting the welfare of all children.